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First name: Tabatha

Last name: Rood

Organization:

Title:

Comments: The DEIS lacks analysis on how existing bureaucratic barriers to fire use will be overcome, as well as a lack of disclosure of where and how beneficial fire use will be allowed and applied. Being that the Northwest Forest Plan amendment is tiered to the agency's Wildfire Crisis Strategy signals that fuels reduction for fire suppression may continue to dominate Forest Service fire management, turning fire use provisions in the Northwest Forest Plan amendment into broken promises.

I echo suggestions of the FAC to:

- \* Expand the discussion of the numerous social, cultural, economic, and ecological benefits of cultural burning and prescribed fire, and contrast these effects with the costs and impacts of mechanical fuels reduction treatments alone and conventional wildfire suppression operations.
- \* Describe the numerous safety risks, economic costs, and direct environmental impacts of conventional wildfire suppression operations to make the case for alternative fire use practices.
- \* Tier the authorization of beneficial fire use from Indigenous cultural burning, prescribed fire, and managed wildfire to the Federal Wildland Fire Policy (1995/2001) and the growing literature on Indigenous fire use.
- \* Provide spatial fire management information on the locations of Potential Operational Delineations (PODs) and fire management zones where wildfires could be managed for resource benefits.
- \* Clarify that Indigenous peoples use fire lighting, not firefighting, and mature/old-growth trees are an outcome, not an objective, of Indigenous fire use. Frequent low intensity burning helps nurture soil, water, and fuel conditions that enabled some trees to grow big and old, with wide range of tree species' diversity, and survive occasional passage of wildfires.
- \* Follow the Good Fire II and III Reports' Recommendations to identify barriers to the exercise of reserved, retained, and other rights by Tribes and their members, including the right to engage in cultural burning and prescribed fire. Make clear to employees and representatives of that agency that the exercising of these rights is welcome and encouraged, and work to remove bureaucratic barriers to beneficial fire inclusion and managed wildfire, including Good Fire II Report's Recommendation #35 to create concrete policies that allow for managed ignitions under particular conditions.
- \* Implement recommendations #15, 16, and 92 from the Wildlife Fire Mitigation and Management Commission's "On Fire" report to empower Tribes to plan and implement more beneficial fire through expansion of the Tribal wildland fire workforce and legal authority to promote cultural burning.

The DEIS acknowledges that the environmental workforce is largely "composed of low-income Hispanic or Latino immigrants and undocumented workers" (3-145) who travel long distances for work. Similarly, other Communities of Interest, "Nontimber Forest Products Gathering" and "Recreation," also travel frequently to different sites across NWFP locations. Without landscape scale analysis, it is unlikely that these groups will be adequately considered in site-specific project analysis since they are unlikely to be present at the time of Environmental Assessment.

In DEIS Section 3.8.1.12 Environmental Justice, the subsection titled "Environmental Workforce" (3-145) acknowledges some of the inequitable labor practices that this workforce faces. However, this section fails to provide a more in-depth analysis of how the workforce is distributed and quantify the size and scale of this workforce. More discussion is needed on the equity implications of using temporary migrant workers to compensate for labor shortages. Without comprehensive immigration reform, this form of employment is predicated on inequitable power dynamics perpetuated by centuries of neocolonial practices. Furthermore, the DEIS refers to certain types of labor performed by the environmental workforce as "unskilled" (3-121; 3-151) or "low-skilled" (3-122) labor. This type of language is demeaning to workers that have accumulated decades of experience by doing this type of work and erodes class solidarity by reinforcing a hierarchy of labor.

- \* Provide mechanisms to consistently inspect for and aggressively enforce federal, state, and local wage and safety regulations for contractors in the NWFP management area, including regarding wage theft, worker intimidation, and heat and catastrophic wildfire smoke exposure.

- \* Consult regularly with workers and worker-organizations to develop protocols for worker protections in the implementation of NWFP projects. More thoroughly address and assess the over-representation of Indigenous, Black, and other marginalized and racialized communities in certain forms of work and the specific vulnerabilities of that work.

- \* Create an additional ECON-SUST-DC that incentivizes safe, sustainable, and equitable working conditions for forest workers and fair compensation for this work.

- \* Use language that elevates the importance of the environmental workforce and does not demean worker labor or reinforce the segmentation and hierarchical arrangement of the workforce.

- \* Provide landscape level analysis of disproportionate harm to forest and fire workers caused by catastrophic wildfire caused smoke and heat (both of which are exacerbated by climate change).