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Organization:

Title:

Comments: To the United States Forest Service,

I am a Natural Resources student focusing on ecological restoration at Oregon State University. As I am entering this field, I am faced with many concerns as to how I will contribute to the future of our forests. We are all aware: the times we are living in are crucial, and current decisions being made of forest management will shape the future of this invaluable treasure which serves so many important purposes. As a future Natural Resources professional, I have the great responsibility to make ethical decisions when working in this field which will have considerable impact on Indigenous communities. As I have progressed in my studies, I have learned how important it is to me that my future participation in this field is ethical in ways that not only prioritize conservation, biodiversity, and resilience of native ecosystems, but help to restore cultural practices of Indigenous Communities throughout the Northwest. I dream of following Indigenous leadership in my locale while stewarding the land; I am therefore writing to you to advocate for sufficient Tribal Sovereignty and the authorization of Indigenous Cultural Burning in the Amended Northwest Forest Plan.

In my Managing Natural Resources for the Future course, we discussed landscape disturbances, focusing on forest fires and the escalation of uncontrolled, high-intensity fires over the last century. The content acknowledged that the leading causes of this were due to fire suppression and climate change, highlighting prescribed burning and forest thinning as a solution to mitigating the overgrowth of fuel in the understory. What the content lacked was the inclusion of cultural burning as a solution. Cultural burns are executed at lower intensity than USFS implemented, prescribed burns and are strategic, considering many outcomes that promote biodiversity. Cultural burns aim to restore soil conditions allowing for the regrowth of native plants by reducing the competition from other invasive plants (Greenler et al. 2024, p 10). Cultural burns thin forests making them less prone to the spread of uncontrolled fires, while opening up the landscape, rejuvenating meadows, and hollowing out trees to allow for habitat of cavity dwelling animals (WORLD, 2024). It is important to differentiate cultural burning from prescribed burning: as it stands, current USFS procedural prescribed burns limit their focus to acreage and reducing fuel loads while lacking objectives which consider ecological outcomes and cultural resilience for Indigenous communities (How The Indigenous Practice of 'Good Fire' Can Help Our Forests Thrive, 2024b).

Historically, the USFS has viewed cultural burning as a threat to the timber industry, prohibiting cultural burns, implementing a rhetoric of "fire is destruction" and giving birth to Smokey the Bear as the US forest-protector mascot (AJ+, 2019, 5:15). This is not only racially unjust; fire suppression has led to major consequences with increased fuel-loads in NW forests today.

The prohibition of cultural burns has stolen generations of cultural practices and transferred knowledge from Indigenous communities not only by making the practice illegal, but by making harvesting sites of important traditional materials used for food, medicine, and ceremonies inaccessible through the spread of invasive species (Kruger, 2023b). Invasive species spread has also eliminated plant species of important cultural use. Cultural burning is a form of land stewardship that not only promotes the availability of culturally significant plants, but also serves as a culturally significant practice in which knowledge is shared, promoting Indigenous cultural resilience.

While tribal inclusion is increasingly being introduced into policymaking; it is still in question of how much value is being placed on this inclusion, and how much is performative. For example, Indigenous leaders who are currently reworking the Northwest Forest Plan, are working exceptionally hard to hold the USFS accountable. The USFS actions which include limiting the committee to less than one year of constructing the amendment before

presenting it has not allowed for enough time to collaborate with the input of dozens of Tribes. It is also addressed that the bureaucratic language of the Northwest Forest Plan has made it difficult for tribes to engage in its reconfiguration (Ehrlich, 2024). Cultural and language differences between Indigenous communities and USFS are no excuse for the actions of USFS which limit the accessibility of these important changes to Indigenous communities. With current restrictions that require approvals for cultural burns from USFS, there is a loss of transfer of generational knowledge.

Despite pushback the Yurok, Karuk, and Hupa Tribes have been reinstating cultural burning on their lands in North California and they do so with great care, consideration, and assessment for the ecosystem. I recently watched a powerful documentary, "Firelighters: Fire is Medicine" (accessible on YouTube) which I highly recommend as a sampling of what a future where Cultural Burns are administered could look like (WORLD, 2024). The documentary exemplifies how these Tribes have fought to revitalize this culturally significant practice and how it has strengthened their communities and the resilience of ecosystems. The practice of cultural burning is integral in the history of many North American Indigenous cultures, and this form of land stewardship supports other cultural practices by keeping culturally significant species available along with creating the opportunities to share this wealth of knowledge with following generations.

I want to stress the need for cultural burns as opposed to prescribed burns, which is why I am advocating for the following changes to the NWFP. Tribes need decision making power to implement these burns when needed; it is unjust for Tribes to have to wait for approvals and have time limitations, as cultural burns need to be precisely timed to promote specific plant species growth and fit culturally significant learning opportunities (How The Indigenous Practice of 'Good Fire' Can Help Our Forests Thrive, 2024b). Tribes need decision making power to implement these burns when needed. While the DEIS is proposing the expansion of Tribal Inclusions in the Northwest Forest Plan, there is not sufficient Tribal sovereignty and fire inclusion analysis. Wherever applicable, barriers that withhold Tribes from meeting their objectives should be removed.

I suggest the following:

- *Retain all Tribal inclusion plan components (Goals, Desired Conditions, Objectives, Standards, Guidelines, and potential Management Approaches) in Alternative B. Strengthen Tribal inclusions plan components in Alternatives C and D by including (most or all) approaches from Alternative B.

- * Include the FAC's full Tribal Inclusion recommendation preamble (pg. 8-9) into the Record of Decision and any other relevant areas, with special emphasis on the section:

Over a century of fire suppression, coupled with regulatory restrictions, removal of Indigenous practitioners and practices (including cultural fire), as well as assimilationist policies from the boarding school era, have led to today's increased risks from catastrophic wildfire and has also created structural barriers and mechanisms preventing Indigenous peoples from enacting sustainable stewardship. The NWFP amendment must signal a shift in Tribal relations across NWFP forests and include an apology for the exclusion of Tribal communities from the original formulation of the NWFP and call for healing and reparations for over a century of settler colonialism, land dispossession, criminalization and marginalization of Indigenous cultural stewardship practices, and mismanagement of Tribal lands.

- * Add Tribal inclusion measures to Alternative B and C that are included in Alternative D but not in B, which include Tribal involvement in protecting rare and listed plants, post-disturbance management, and first foods management. These plan components are:

- * TRIBAL-FORSTW-ALL-GOAL-08-D

- * TRIBAL-FORSTW-ALL-GOAL-09-D

* TRIBAL-FORSTW-ALL-PMA-D

* For restoring dry, serpentine, and wet meadow-associated culturally significant species, utilize TRIBAL-FORSTW-ALL-OBJ-03-D from Alternative D rather than TRIBAL-FORSTW-ALL-OBJ-03 from Alternative B across Alternatives B and C.

* TRIBAL-FORSTW-ALL-OBJ-03-D uses "10 projects" as the metric rather than 2000 acres, which can better allow for different scales of stewardship as defined by Tribes.

* Change TRIBAL-FORSTW-ALL-DC-05 and TRIBAL-FORSTW-ALL-DC-09 to incorporate stronger language from Federal Advisory Committee Desired Condition 1-16, which reads:

* "Cultural burning is recognized as an inherent Tribal right and responsibility that has existed for millennia and is rooted in Tribal laws and Indigenous knowledge, practices, and belief systems. The Forest accommodates cultural burning and coordinates, consults, and collaborates with Tribes in order to create conditions conducive for this Tribal sovereign practice."

* National forests should accommodate both cultural fire and Tribally-led prescribed fire, allowing Tribes to define for themselves the management techniques needed to achieve their objectives.

* Change TRIBAL-FORSTW-ALL-STD-06 to remove this sentence: "A closure shall affect the smallest practicable area for the minimum period necessary for activities of the applicable Tribe." This sentence could be used to justify restricting the scope of closure orders desired by Tribes.

* Move Potential Management Approaches to Standards or Guidelines so they are enforceable, especially:

* TRIBAL-FORSTW-ALL-PMA-A through TRIBAL-FORSTW-ALL-PMA-H

Through my Natural Resources studies at OSU, I have come to realize that the realm of Natural Resources seems to have a different interpretation of the meanings of conservation and ecology than the ideologies presented in my Indigenous Sciences coursework; Western land management practices all too often focus on benefitting the extractive industry, while Indigenous ideologies feel more in line with the true western definitions of conservation and ecological thinking. It would be amiss to not state the obvious, that the lands being regulated and opened for use of the "public" were stolen, the foundations of this land use are embedded in colonization, violence and oppression. Introducing the landscape to use for profit, and continuing to exploit public lands as we do today for timber, minerals, and oil sales deviates far from the definition of conservation which means, "a careful preservation and protection of something" (Conservation, 2025).

Indigenous communities have stewarded the land for time innumerable and have invaluable empirical knowledge regarding the lands that I and other non-Indigenous Americans occupy. Indigenous Sciences center a holistic view that considers concepts of kinship and stewardship towards the ecological world and all species that share our planet. It is essential that this knowledge which continues to adapt to contemporary conditions and challenges, be shared to future generations through unimpeded practice. It is pertinent that this holistic worldview is incorporated within the framework of the USFS through collaboration with Indigenous Communities; as the sole consideration of Western thought is not only limiting, Euro-centric, and non-inclusive, but also outdated. All too often, Indigenous People, their stories and their impacts in history are presented as skewed or left in the shadows in the Western world. As non-Indigenous NR students seeking to work on land that is not ours, we must prioritize Indigenous concerns to be better allies to Indigenous communities.

I know I am not the only one entering this field who feels the great responsibility, as someone with colonizer descent, to center Indigenous perspectives and leadership as I move forth in my education and career. As Amanaka Yancey says in the Fire Lighters documentary, "I am a guest. When you're a guest in someone's home, how do you interact in that space?" This is an amazing opportunity to amend a history of harm towards North

American Indigenous people and also restore the health of our at-risk forests and all of its inhabitants. The incorporation of Indigenous knowledge and giving Tribes the agency to make decisions regarding land stewardship would not only promote the health of our forests, but strengthen the USFS through diverse perspectives and problem-solving. The USFS must adapt; as I will stress again: these times are urgent and we are in need of change. It's time that the USFS move forward with this ecological movement and leave outdated and racist practices and policies behind.

Thank you for your time and consideration.

Sincerely,
L Wood Hensens

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