

The Stewardship Project is a collaboration of leading academics and tribal cultural practitioners supported by the Climate & Wildfire Institute. This new initiative is intended to promote greater use of active stewardship in the Western United States to address the wildfire crisis. It is critical to realign federal policies in a non-partisan way to prioritize scientifically sound restoration, including Traditional Indigenous Knowledge, and enable greater use of Indigenous practices.

The Stewardship Project and Climate and Wildfire Institute see the Farm Bill as a powerful legislative vehicle to recognize Indigenous authority and expand use of beneficial fire on Forest Service and Tribal landscapes. Below are our recommendations that address the Tribal right to steward, workforce and capacity development, regulatory realignment, and public management areas.

## Tribal Right to Steward

- © Codify a rebuttable presumption that Tribal entities can conduct proposed stewardship activities on federal lands, which federal agencies may attach reasonable conditions to but not significantly alter or unilaterally deny.
- Expand the authority of the Forest Service and other USDA agencies to enter into co-management with Tribal entities. Ensure tribal entities can hold final decision-making power, with the support and consultation of federal agencies.
- Requires that tribal entities are included in the decision making structures for all Farm Bill programs.

## Regulatory Realignment

- Direct the USDA to determine that reintroduction of beneficial fire is not a federal action for NEPA, as fire activity aligned with Indigenous fire regimes are part of baseline conditions. Require the USDA to include in its NEPA analysis for forest management projects the risks posed by fire suppression and uncharacteristically severe wildfires and the ability of alternatives to reduce potential wildfire impacts.
- Direct that reintroduction and maintenance of beneficial fire as a mechanism to steward the firedependent ecosystems upon which endangered and threatened species depend is not an "agency action" pursuant to the Endangered Species Act.

## Public Land Management Areas

- Develop Strategic Fire Zones by requiring Federal land management districts or field offices with contiguous blocks of land or willing neighboring lands within a "defensible" watershed to evaluate these areas for potential designation in consultation with local tribal entities and communities.
  - Within identified Zones, require federal land managers to develop burn plans for identified
    watersheds that use a wildfire ignition as a prescribed fire, with clearly articulated objectives
    for assessing before and after fire behavior, smoke impacts, and whether management actions
    are needed.
  - Prioritize completing stewardship activities along Strategic Fire Zone boundaries to facilitate
    managed fire use, using recognized scientific principles, traditional environmental knowledge
    and burning practices, and community input.
  - Require development of regional "Strategic Fire Commissions" comprised of knowledgeable local tribal entities, fire scientists, fire managers, air quality specialists, public health specialists, and other key interested parties to evaluate the objectives of each Strategic Fire Zone.
- Designate Adaptive Management Study Areas to allow large-scale experimental trials of management actions.
  - These areas should be designated at the scale of federal management districts large enough to encompass a wide range of biophysical and ecological variability and to allow for multiple ongoing large-scale experiments simultaneously.
  - Managers should be expected to rigorously test management practices that may enhance
    resistance or resilience to novel fire and climate conditions. Management experiments could
    consist of planting, thinning, burning, or post-fire fuel management actions, for example.
    Experiments should be designed to produce high-quality research-level data, with treatment
    replication, controls, and before-after measurements.
  - Provide support to ensure public dissemination of experimental results from this work.
  - Develop a national network of shared data and results reporting procedures to support adaptive approaches.
  - To foster collaborations, require the formation of Adaptive Management Study Area Boards, consisting of federal and university researchers, tribal members, the forestry and wood products industries, NGOs, and community members, as well as Forest-level silviculturists, fuels specialists, and others. The role of the Boards should be to foster creative, novel management approaches, and Boards should not be required to come to consensus in order for managers to proceed with experiments.
  - Experiments should not be subject to standard risk management guidance.
  - Lessons learned from Adaptive Management Zones attempted in the Pacific Northwest should be incorporated into the new Adaptive Management Study Areas.



