



MUCKLESHOOT WILDLIFE PROGRAM

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Regional Forester
U.S. Forest Service
1220 SW 3rd Avenue
Portland, OR 97204

January 22, 2024

Dear Pacific Northwest Region Forester:

The Muckleshoot Wildlife Program and Wildlife Committee have reviewed the Northwest Forest Plan (NWFP) Amendment Notice of Intent to prepare an Environmental Impact Statement. The comments we present below are only from the Tribe's Wildlife Committee and do not necessarily represent the views of other Tribal programs or members who may comment separately. We applaud the Forest Service's initiative to amend the NWFP based on the incorporation of indigenous knowledge, improving forest resilience to fire and climate change, and increasing regional biodiversity. We reviewed the notice of intent, but since this is a comprehensive amendment to the NWFP we also suggest a few additional changes that should be included.

The NWFP encompasses the historical home and Treaty area of the Muckleshoot Tribe and currently provides many spiritual, cultural, and subsistence benefits and recreation opportunities for Tribal members. While the NWFP provided protection of old forests and ways to promote those characteristics, it also limited the creation or maintenance of early successional forest ecosystems (ESFE's) on lands that were designated Late Successional Reserve (LSR). Lack of early successional forest reduces biodiversity and negatively impacts deer and elk by reducing available forage. This reduction in forage can lead to a reduced carrying capacity which in turn decreases tribal hunting opportunity and first foods availability as shown in the Tribe's own research (Vales et al 2017).

Over the years the landscape has been managed for various products by various landowners and has changed dramatically. One important historical Tribal management tool currently lacking is fire. The USFS must recognize its Trust Responsibility to Tribes and manage the landscape for various important Tribal resources. We hope the USFS will consider Executive Order 13175 and engage in meaningful consultation and coordination with Tribal Governments to provide for cooperative land management and co-stewardship through the development and implementation of the new NWFP.

Sincerely,

Mike Jerry, Sr.
Chair, Muckleshoot Wildlife Committee

Vales, D.J., Middleton, M.P., McDaniel, M. 2017. A nutrition-based approach for elk habitat management on intensively managed forestlands. J. For. 115(5):406-415