Albert M. Pollmar

15067 Cedar Grove Road NE Poulsbo, Washington 98370 January 30, 2024

Regional Forester, Region 6, U.S. Forest Service Attention: Northwest Forest Plan Comments 1220 SW Third Avenue Portland, Oregon 97204

Regarding: Enclosed Formal Comment

Some Preliminary Thoughts on Amending the Northwest Forest Plan

Contact Information for Albert M. Pollmar

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Additional Information

I've prepared the following, enclosed comment (two numbered pages) in my own right as a cabin owner on National Forest System Lands in the State of Washington. Location: Upper White River Valley, Silver Creek, Mount Baker-Snoqualmie National Forest.

I'm not representing anyone except myself, although in the past I've served as: President and Secretary, White River Recreation Association President and Secretary, Washington State Forest Homeowners Association Chairman, Fee Research Committee, Cabin Coalition (C2)

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Albert M. Pollmar January 28, 2024

Some Preliminary Thoughts on Amending the Northwest Forest Plan

USDA Forest Service Press Release Dated December 15, 2023

Notice of Intent to Develop a Northwest Forest Plan Amendment: In the first paragraph it states that "The process will be informed by robust engagement with stakeholders across all affected geographies to address urgent land management concerns including wildfire resilience, climate change adaptation, and greater tribal inclusion in the plan." To what extent have cabin owners been consulted? They've learned a great deal about wildfires in recent years, much of it the hard way.

The third paragraph repeats the apparent commitment of the first; namely that the Northwest Forest Plan Federal Advisory Committee will bring together "diverse perspectives representing the experiences of communities, experts, tribes, and other interested parties across the Northwest Forest Plan landscape." Cabin owners have been immersed in these issues for decades. If allowed, they could provide a great deal of valuable, relevant information to the Committee that is not available anywhere else.

I applaud the greater tribal inclusion contemplated in this revision to the plan. But I am dismayed by the apparent exclusion of cabin owners from this phase of the planning process. Given their numbers and the income they provide to the Forest Service, they should have been included. What about the "robust engagement with stakeholders" described in the first paragraph and the "communities" and "other interested parties" identified in the third? Cabin owners are stakeholders, they exist in discrete communities and support nearby cities and villages through the economic activity they generate. Beyond that, many of the cabins are old and beautiful, constructed of native materials nearly a century ago. They are, in a word, irreplaceable: a unique, historic resource that should be recognized and preserved wherever possible.

Other reasons could be cited for listing cabin owners specifically rather than assuming they are included within the nondescript, generic category: "other interested parties." In my view, that reduces them to the level of an afterthought, people whose use of the national forests is so inconsequential it needn't be directly addressed.

Issues of Tribal Sovereignty

There is some confusion among cabin owners in the Pacific Northwest about how the national forests will be managed in the future. It involves local Native American tribes acquiring a right to "co-manage" the national forests together with the Forest Service. Given the fact that many indigenous tribes are viewed as legally sovereign nations, it raises the question, at least in my mind, of whether this shared management arrangement is not, in fact, a partial surrender of sovereignty on the part of the United States.

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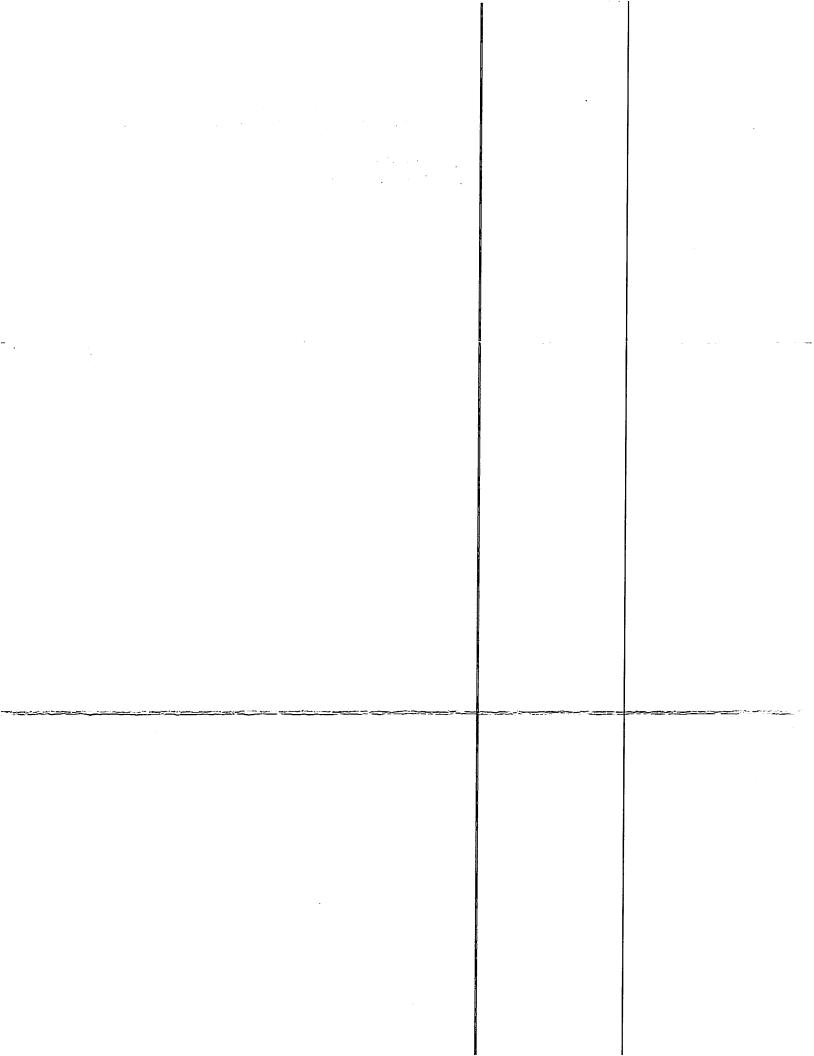
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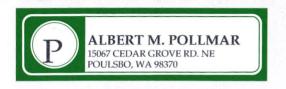
This is not a trivial question, even if it has a simple answer. Cabin owners have long been accustomed to living within the rules set down by the Forest Service. And we know we can petition our elected representatives if we feel a decision is contrary to law or injurious to our interests. But with this kind of shared management, would we now have two masters, in effect, rather than one? What if there were a conflict between the tribe and the Federal Government? Who would prevail? What rights would cabin owners still possess? To whom would they appeal an adverse decision?

Part of the problem we're facing is that this fundamental change in management policy has not been shared with the general public. I may be wrong about its anticipated effects, I hope I am, but as it stands now, this change in policy could prove to be extremely disruptive. In any case, I feel the American people should have been consulted first, before this major change in policy was apparently adopted. I've heard it's a nationwide directive from Washington, DC. If so, please give us the details and an opportunity to respond.

Thank you,

Albert M. Pollmar, Former President and Secretary Washington State Forest Homeowners Association





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