

## Appendix A:

Below are our specific comments, notes, edits and recommendations on the Tribal plan components of the Draft EIS. We include associated FAC recommendations as well for reference when present.

1. **DEIS: BIO-DC-01** (Beaver habitat is maintained or restored to promote improved beaver presence in watersheds, **in populations sufficient to fulfill their ecological function** ~~and~~ to benefit ground water, surface water, and aquatic habitat complexity to support the conservation and recovery of imperiled aquatic species ~~in populations sufficient to fulfill their ecological function.~~)

**FAC: 1-28** (DC: Improved beaver habitat conditions promote beaver presence in watersheds where beaver activities benefit ground water, surface water, and aquatic habitat complexity, and where beaver activities support conservation and recovery of imperiled aquatic species, and in populations sufficient to fulfill their ecological function.)

**Notes:** The phrase “in populations sufficient to fulfill their ecological function” should refer to beavers, not to imperiled aquatic species, as the DEIS suggests (suggested language in **red**).

2. **DEIS: BIO-DC-02** (Indigenous Knowledge is meaningfully incorporated into Biological Assessments, Biological Evaluations, and other regulatory and compliance processes related to the Endangered Species Act to the greatest degree possible (including related to **setting** Limited Operating Periods **and Critical/Suitable Habitat Designations**) and in ways that honor tribal data and knowledge sovereignty, and which include free, prior, and informed consent by Tribes to the extent permitted by law.)

**FAC: 1-31** (DC: Indigenous knowledge is meaningfully incorporated into Biological Assessments and other regulatory and compliance processes related to the Endangered Species Act to the greatest degree possible (including related to Limited Operating Periods) through processes led by Tribes or in collaboration with Tribes, and only in ways that honor Tribal data and knowledge sovereignty, and which include free, prior, and informed consent by Tribes and Tribal people.)

**Notes:** Include Critical and Suitable Habitat Designations as specific examples (suggested language in **red**).

3. **DEIS: BIO-GDL-01** (To honor treaty and other tribal rights, Forest Service staff in the plan area should **prioritize early engagement** and sustain staff to staff **consultation**, coordination and collaboration with relevant Tribes, in planning, monitoring, and management activities related to federally listed threatened and endangered species and other plant and animal species of interest to Tribes.)

**FAC: 1-82** (GDL: To honor Treaty and other Tribal Rights, prioritize early and sustained staff-to-staff consultation and coordination with relevant Tribes, in planning, monitoring, and management activities related to Federal and State Threatened and Endangered Species and Species of Conservation Concern.)

**Notes: Include the word “prioritize” and also “consultation” as well as coordination and collaboration, as suggested in red in the DEIS rec.**

4. **DEIS: BIO-GDL-02** (To ensure that Indigenous Knowledge is incorporated to the **greatest possible extent** ~~permitted by law~~, national forests in the Northwest Forest Plan area should consult, collaborate, and coordinate with interested local Tribes and other Federal agencies in the development of Biological Assessments, Limited Operating Periods, **Critical and Suitable Habitat Designations** and Endangered Species Act compliance documents throughout the consultation process with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service as appropriate.)

**FAC: 1-85** (GDL: To ensure that Biological Assessments, Limited Operating Periods, and other Endangered Species Act compliance obligations are aligned with Indigenous knowledge, values and cultural practices, USFS should consult, collaborate, and coordinate with interested local Tribes and other Federal agencies in the development of these documents and operating periods and throughout the consultation process with the U.S. Fish and Wildlife Service.)

**Notes: Include Critical and Suitable Habitat Designations as specific example. Change “to the extent permitted by law” (which is always the case and doesn’t need to be stated) to “greatest extent possible”.**

5. **DEIS: BIO-PMA (2)** (Work with relevant federal, state, **and tribal** agencies to coordinate authorities and resources to effectively manage threats to imperiled species.)

**FAC: No corresponding rec.**

**Notes: Add “and Tribal” to this plan component as shown above; otherwise not sure why this is in the Tribal section.**

6. **DEIS: BIO-PMA (3)** (Work with USFWS and NOAA-NMFS **as well as relevant Tribes** to address urgent environmental threats to habitat of listed species through the informal and formal ESA consultation procedures to achieve long-term species resiliency.)

**FAC: No corresponding rec.**

**Notes:** Add “as well as relevant Tribes” to this plan component; otherwise not sure why this is in the Tribal section.

7. **DEIS: COSTW-OBJ-01** (At Tribal request, work with relevant Tribes to co-develop and implement appropriate agreements within two years through any available instruments between national forests in the Northwest Forest Plan area and Tribes to establish consultation, and collaborative and cooperative management protocols and processes.)

**FAC: 1-40** (OBJ: Within two years and at Tribal request, work with relevant Tribes to co-develop and implement with interested Tribes programmatic agreements as directed by Tribes (e.g., memoranda of agreement, memoranda of understanding, master stewardship agreements, stewardship agreements, TFPA agreements, bilateral agreements, interagency agreements, NHPA section 106/110 responsibilities) between the Forest and Tribes to establish consultation protocols and cooperative/collaborative management processes.)

**Notes:** While we understand the value of broadening the scope to all appropriate agreements, we appreciate the specificity of the FAC recommendation language - that it's intended to relate to collaborative and cooperative management processes and at the request of Tribes. Proposed revisions above.

8. **DEIS: COSTW-GDL-02** (Solicit and act on recommendations and requests from relevant and interested Tribes for specific areas within the Northwest Forest Plan area where co-stewardship should occur. Complete a framework for assessing and implementing those recommendations from Tribes.)

**FAC: 1-83** (GDL: The Forest Service should solicit recommendations and/or requests from Tribes that specific land use allocations or other areas of tribal importance should be dedicated to co-stewardship and complete a framework for assessing and implementing those recommendations and/or requests from Tribes.)

**Notes:** Include this as a GDL rather than a PMA.

9. **DEIS: COSTW-PMA (1)** (Encourage the inclusion of Tribes at the beginning of project development and prioritization of workplans, including annual and longer-term programs of work.)

**FAC: 1-101** (MA: In the development of Forest annual work plans, encourage the inclusion of Tribes at the beginning of project development and prioritization of annual (and longer term) plans and programs of work.)

**Notes:** Mention of long-term programs of work is important to include in the DEIS rec.

10. **DEIS: FORSTW-DC-02** (Vegetation types and conditions enable ecological and cultural processes including fire use and stewardship practices, can provide a sustainable, harvestable, and accessible diversity of habitats necessary to provide plant, fungi, and animal species that are of tribal importance for traditional, ceremonial, and medicinal purposes. Plants, fungi, and animals known to be used and stewarded by Tribes for traditional use are thriving in the plan area.)

**FAC: 1-9** (DC: Vegetation types and conditions, as well as enabling ecological and cultural processes including fire use and stewardship practices, provide a sustainable, harvestable, and accessible diversity of habitats necessary to provide plant, fungi, and animal species that are of Tribal importance for traditional, ceremonial, and medicinal purposes. Plants, fungi, and animals known to be used and stewarded by Tribes for traditional use are thriving in the Forest.)

**Notes:** We prefer the FAC language (“enabling ecological and cultural processes including fire and stewardship”) rather than the DEIS language (“veg types enable”) because the cultural practices support the plant composition, structure and conditions. It’s not that vegetation types and conditions enable ecological and cultural processes, but that cultural processes such as fire use and stewardship practices provide a diversity of habitats for sustainable populations of plants, fungi, and wildlife.

11. **DEIS: FORSTW-DC-04** (The Forest supports and consults with Tribes to acknowledge and respectfully share Indigenous Knowledge, expertise, and practices in meaningful co-stewardship of NFS lands within the range of the NSO including, but not limited to, planning, design, and implementation of prescribed fire and proactive wildfire management and mitigation actions and related practices to the extent permitted by law.)

**FAC: 1-17** (DC: The Forest supports and works with Tribes and Indigenous people to acknowledge and respectfully share Indigenous knowledge, expertise, and practices in meaningful co-stewardship including, but not limited to, planning, design, and implementation of prescribed fire and proactive wildfire management and mitigation actions and related practices.)

**Notes:** The recommendations are very similar, but we prefer the FAC recommendation language. Why is “to the extent permitted by law” included- isn’t this always implied?

12. **DEIS: FORSTW-DC-05** (The Forest supports and consults with Tribes to incorporate Indigenous Knowledge, expertise, and cultural stewardship practices in co-stewardship and adaptive management of lands in land use allocations for NFS lands within the range of the NSO, including Late-Successional Reserves and late-successional and old growth stands to the extent permitted by law. This includes supporting, enabling, and

accommodating Indigenous fire use for cultural and ecological purposes in accordance with applicable federal law, regulations, and policy.)

**FAC: 1-18** (DC: The Forest supports and works with Tribes to center Indigenous knowledge, expertise, and cultural stewardship practices in co-stewardship and adaptive management of lands in all land use allocations, including Late-Successional Reserves and late-successional and old growth stands. This includes supporting, enabling, and accommodating Indigenous fire use for cultural and ecological purposes.)

**Notes: We like the FAC recommendation- again, why are the “to the extent permitted by law” and ‘in accordance with applicable federal law” clauses included? Isn’t this always implied?**

13. **DEIS: FORSTW-DC-10** (Culturally significant plants used by Tribes who traditionally use the Forest are thriving and are protected from overharvest from both commercial and non-commercial uses.)

**FAC: 1-10** (DC: Through monitoring, ensure that culturally significant plants used by Tribes who traditionally use the Forest are thriving and properly protected from overharvest from both commercial and non-commercial uses.)

**Notes: DEIS language is fine for a DC, but we’d like to still encourage the use of monitoring**

14. **DEIS: FORSTW-DC-12** (Tribal members have access to the Forest for the exercise of treaty and other tribal rights regarding cultural, ceremonial, and traditional uses.)

**FAC: 1-8** (DC: The Forest coordinates with Tribes to ensure Forest access by tribal members for the exercise of Treaty and other Tribal Rights regarding cultural and traditional uses.)

**Notes: We prefer the FAC language around “coordinates with Tribes to ensure”**

15. **DEIS: FORSTW-OBJ-01** (Within 5 years, each national forest in the Northwest Forest Plan area should **jointly** develop and implement at least three projects in partnership and collaboration with Tribes that support restoration of priority culturally relevant species.)

**FAC: 1-34** (OBJ: Collaborate with Tribes to jointly develop and implement programs and projects that support the restoration of priority culturally relevant species. Within 5 years, each Forest Unit should develop at least 3 such projects in partnerships with Tribes.)

**Notes: We prefer the FAC language: “collaborate with Tribes to jointly develop”.**

16. **DEIS: FORSTW-OBJ-03** (Annually implement projects that increase populations or maintain or restore habitat for dry, serpentine, and wet meadow-associated culturally significant species, such as camas or other species **identified through consultation with interested Tribes**, by 2,000 acres across the Northwest Forest Plan area.)

**FAC: 1-36** (OBJ: Annually increase or improve dry, serpentine, and wet meadow-associated culturally significant species, such as camas meadows or other species identified through consultation with interested Tribes by 2,000 acres or other metric meaningful to the Tribe.)

**Notes: We recommend adding “identified through consultation with interested Tribes” to the DEIS recommendation.**

17. **DEIS: FORSTW-OBJ-04** (**Within two years**, Each unit across the NWFP area, enters into one or more government-to-government agreement(s) with Tribes to co-design, plan and implement habitat enhancement projects for culturally significant species and practices **while protecting Tribal data sovereignty**. Develop an implementation strategy for NHPA section 304 on confidentiality (54 USC § 307103) that responds to tribal needs to protect the confidentiality of religious practices.)

**FAC: 1-42** (OBJ: Within two years, enter into one or more Government-to-government agreement(s) with Tribes per Forest to co-design, plan, and implement habitat enhancement projects and programs for culturally significant species and practices through processes that respectfully engage Indigenous knowledge and values while both promoting Tribal workforce capacity and protecting Tribal data sovereignty and culturally sensitive information about culturally significant species, places, and practices. Develop an implementation strategy for NHPA section 304 on confidentiality (54 USC § 307103) that responds to Tribal needs to protect the confidentiality of religious practices.)

**Notes: The FAC language is more specific and nuanced and the DEIS OBJ needs a timing component to be an Objective. Please add the 2-year timing component back as well as the language “while protecting Tribal data sovereignty.”**

18. **DEIS: FORSTW-STD-04** (Tribes shall have access to areas that provide an opportunity to practice traditional, cultural, and religious activities, ~~consistent with federal law~~. Relevant Tribes may seek temporary closures in national forests within the Northwest Forest Plan area in accordance with the Tribal Cultural and Heritage Cooperation Authority. Formal consultation and notification to Tribes shall be conducted for any activities in sacred site areas.)

**FAC: 1-53** (STD: Tribal members and people shall have reasonable access as determined by the relevant and interested Tribe to areas that provide them an opportunity to practice

traditional, cultural, and religious lifeways, such as plant gathering, fishing, hunting, stewardship and ceremonial activities that are essential in maintaining their cultural identity and the continuity of their culture. Relevant Tribes may seek temporary closures of Forest Service lands in accordance with the Tribal Cultural and Heritage Cooperation Authority. Formal consultation and notification to Tribes shall be conducted for any activities in sacred site areas.)

**Notes: The FAC language is more precise. Consistent with federal law is implied throughout this document and unnecessary to restate.**

19. **DEIS: FORSTW-GDL-01** (Upon a Tribe's request, work with Tribes to develop ecocultural co-stewardship implementation plans to prioritize the restoration of forest and non-forested ecosystems and communities to support the propagation of treaty and other protected tribal resources, first foods, and other cultural uses of culturally significant species (such as basketry, fiber, medicinal, regalia, ceremonial species) and associated habitats.)

**FAC: 1-80** (GDL: Upon Tribal request, the Forest should work with Tribes to develop ecocultural stewardship implementation plans to prioritize the restoration of Forest as well as related non-Forest ecosystems and communities to support the propagation of treaty resources, First Foods, and other cultural use of culturally significant species (e.g. basketry, fiber, medicinal, regalia, ceremonial species) and associated habitats.)

**Notes: Minor language tweak suggested to the DEIS recs (in red).**

20. **DEIS: FORSTW-GDL-03** (To ~~allow~~-enable tribal access to first foods and culturally significant botanical species, collection of special forest products should not be permitted or should be limited if, after consultation with the relevant tribal governing body, national forests in the Northwest Forest Plan area determine it may result in significantly interfering with a Tribe's access to culturally important resources. If access or gathering is authorized, such activities should minimize conflicts with the exercise of treaty and other protected tribal rights protected by federal law.)

**FAC: 1-75** (GDL: To ensure Tribal access to First Foods and culturally significant botanical species, collection of special forest products should not be authorized if Tribal access to culturally important resources is diminished, as identified by relevant Tribes. If access or gathering is authorized, such activities should minimize conflicts with Tribal uses, Trust responsibilities and Treaty and other Tribal rights and resources.)

**Notes: The FAC GDL focuses on the Tribe as the decisionmaker, not the Forest Service. This determination should be made by Tribes themselves, not the agency. The phrase “as identified by relevant Tribes” should be re-included in the DEIS rec.**



21. **DEIS: FORSTW-PMA (3)** (Upon a Tribe's request, the Forest shall ~~strive to~~ enter into at least one memorandum of agreement or other formal instrument with each Tribe with treaty or other protected tribal rights on each national forest in the Northwest Forest Plan area pertaining to fire co-stewardship, cultural burning, cultural heritage and resource monitoring, wildfire management, wildfire risk reduction, and post-fire recovery.)

**FAC: 1-57** (STD: Upon Tribal request, the Forest shall enter into at least one memorandum of agreement or other formal instrument with each Tribe with reserved and/or unreserved treaty rights on each forest unit pertaining to fire stewardship, heritage monitoring, wildfire management, wildfire risk reduction and management, and post-fire recovery.)

**Notes: This is important, and should be a STD or an OBJ if a time component is included. Remove “strive to”**

22. **DEIS: FORSTW-PMA (6)** ~~In consultation, coordination and collaboration with relevant Tribes~~, silvicultural treatments including fire are used in all LUAs, and in both moist and dry stands, to promote ecologically and culturally appropriate species such as beargrass and huckleberry.)

**FAC: 3-15 [Fire Resilience]** (MA (5): The Forest Service incorporates silvicultural treatments (which could include fire) as ecologically and culturally appropriate, in moist forests (e.g., to support active huckleberry/bear grass patch management).

**Notes: Include “In consultation, coordination and collaboration with relevant Tribes” in DEIS plan component.**

23. **DEIS: FORSTW-PMA (7)** (To promote huckleberry abundance over the long-term on NFS lands within the Northwest Forest Plan area and potential habitat for huckleberry, the Forest consults with interested and relevant Tribes on annual huckleberry restoration actions at a scale meaningful to the Tribes and implements restoration actions through consultation with and/or through co-stewardship agreements if possible.)

**FAC: 1-33** (OBJ: To produce huckleberry in a manner that promotes huckleberry abundance over the long-term, the Forest works with interested and relevant Tribes to determine annual huckleberry restoration actions at a scale meaningful to the Tribes, and completes those restoration actions through consultation with and/or through co-stewardship agreements if possible.)

**Notes: An OBJ is preferred to a PMA but DEIS language looks good.**

24. **DEIS: FORSTW-PMA (8)** (Consult, coordinate, and collaborate with Tribes to incorporate Indigenous Knowledge with western science into project and program



planning, prioritization, implementation, and monitoring ~~to the extent permitted by law~~. Honor tribal data and knowledge sovereignty by considering free, prior, and informed tribal consent and protecting culturally sensitive information ~~to the extent permitted by law~~. This includes consultation and collaboration with Tribes on the development and implementation of Biological Assessments, Environmental Impact Statements, Environmental Assessments, and other management and planning documents.)

**FAC: 1-107** (MA: Collaborate with Tribes to incorporate Indigenous knowledge into project and program planning, prioritization, implementation, and monitoring, but only in ways that honor Tribal data and knowledge sovereignty policies and protocols; that involve free, prior, and informed consent; and wherein culturally sensitive information is protected. This includes collaboration with Tribes on the development and implementation of Biological Assessments, Environmental Impact Statements, Environmental Assessments, and other management and planning documents.)

**Notes: Do we need to include “to the extent permitted by law” or is this already implied?**

25. **DEIS: IK-DC-01** (Forest staff recognize the role of Indigenous Knowledge in Historic Preservation issues, potentially including determinations of eligibility, nominations, archaeological and Indigenous Knowledge survey processes and standards, in Section 106 consultation, and in Traditional Cultural Property or Cultural Management Area designations for NFS lands within the range of the NSO ~~to the extent consistent with federal law~~.)

**FAC: 1-32** (DC: Recognize the central role of Indigenous Knowledge in Historic Preservation issues, including determinations of eligibility, nominations, archaeological and TEK survey processes and standards, in Section 106 consultation, and in Traditional Cultural Property or Cultural Management Area designations.)

**Notes: Do we need to include “to the extent permitted by law” or is this already implied?**

26. **DEIS: IK-STD-03** (National forests in the Northwest Forest Plan area shall ~~to the extent allowed under the law~~, prevent the disclosure and maintain the confidentiality of place-based Indigenous knowledge and culturally significant information provided by Tribes with the express expectation of confidentiality in accordance with any data sovereignty protocols, laws, regulations, and best practices.)

**FAC: 1-66** (STD: The Forest Service shall, to the full extent allowed under the law, prevent the public disclosure and maintain the confidentiality of place-based Indigenous knowledge and culturally significant information provided by Tribes with the express

expectation of confidentiality in accordance with any data sovereignty protocols and best practices.)

**Notes: Is “to the extent allowed under the law” needed?**

27. **DEIS: TPTR-STD-01** (Commercial collection of special forest products in the Northwest Forest Plan area shall not be permitted or may be limited if, after consultation with the relevant tribal governing body, the Forest Service determines it may result in limiting tribal members' access to exercise the relevant Tribes' reserved treaty and other protected rights. This determination shall be reviewed annually in coordination with relevant and interested Tribes to ensure treaty and other protected tribal rights are adequately protected.)

**FAC: 1-48** (STD: Commercial collection of special forest products shall not be permitted if the relevant Tribal governing body identifies it would result in limiting Tribal member access to treaty, reserved, or retained resources. This determination shall be reviewed annually in coordination with relevant and interested Tribes to ensure treaty resources are adequately conserved and stewarded.)

**Notes: The FAC STD focuses on the Tribe as the decisionmaker, not the Forest Service. We want this determination to be made by Tribes themselves, not the agency. We therefore prefer the FAC language.**

28. **DEIS: TPTR-STD-04** (Upon a Tribe's request, **strive to enter into** at least one memorandum of agreement or other instrument between each national forest unit in the Northwest Forest Plan area and each Tribe with treaty or other protected tribal rights to: guide the meaningful consultation processes identified with relevant Tribes; include Tribes as partners in the Forest's management and decision making processes; identify and make known each Tribe's particular perspectives, priorities, and interests; allow for protection and restoration of cultural resources and incorporation of Indigenous Knowledge assets to protect sacred sites and Traditional Cultural Properties; and provide for the respect of cultural practices and other important resources. Data privacy and sovereignty protocols shall be observed to the extent permitted by law.)

**FAC: 1-56** (STD: Upon Tribal request, the Forest shall enter into at least one memorandum of agreement or other instrument between the Forest and each Tribe with reserved and/or unreserved treaty rights on each forest unit to: guide the meaningful consultation processes identified with relevant Tribes; include Tribes as partners in management and decision making processes; identify and make known each Tribe's particular perspectives, priorities, and interests; allow for restoration of cultural resources and Traditional Ecological Knowledge (TEK) assets to protect sacred sites and Traditional Cultural Properties (Places); and provide for the protection of cultural

practices and other important resources. Data privacy and sovereignty protocols shall be observed.)

**Notes: The term “strive to enter” isn’t STD language. The FAC rec has stronger language (“shall enter into”) and should be used.**

29. **DEIS: TPTR-STD-05** (At a Tribe's request, ongoing government-to-government consultation for each federally recognized Tribe with relevant historical interests or treaty rights within the Northwest Forest Plan area occurs by way of a tribally established consultation protocol, memorialized by an agreement or agreements between the national forest unit and the relevant Tribes. **Determine the sufficiency of consultation efforts by requesting Tribal feedback on an annual basis.**)

**FAC: 1-60** (STD: At Tribal request, ongoing government-to-government and staff consultation for each federally recognized Tribe and any Tribe with historical or treaty interests in the Forest’s NFS lands occurs by way of a Tribally established consultation protocol, memorialized by a joint agreement of the Forest and the relevant Tribes. **The USFS shall not rely on internal procedures alone to determine the sufficiency of consultation efforts.**)

**Notes: The highlighted language from the FAC rec is important (“The USFS shall not rely on internal procedures alone to determine the sufficiency of consultation efforts”), so we proposed a positive articulation of this.**

30. **DEIS: WRKFOR-GOAL-01** (Work with Tribes to explore available avenues **such as administrative land transfers** to provide workforce housing and office space for tribal natural resources, wildlife, fire, climate resilience, and cultural resources programs to bolster co-stewardship capacity.)

**FAC: 1-98** (GOAL: The Forest Service works with Tribes to expand the use of administrative land transfers to secure land for workforce housing and office space for Tribal natural resources, wildlife, fire, climate resilience and cultural resources programs to bolster co-stewardship capacity.)

**Notes: DEIS goal looks good. Administrative land transfers were one potentially avenue to provide land to Tribes for workforce housing and office space. It could be mentioned as an example.**

31. **DEIS: WRKFOR-GOAL-02** (Support mentorship and leadership programs designed in consultation with interested Tribes to recruit and engage workforce professionals trained as tribal and Forest Service natural resource stewards grounded in culture and tradition to **protect** steward the national forests in the Northwest Forest Plan area through innovative programs, inclusive leadership, and advancing technology supported by relevant Tribes.)

**FAC: 1-14** (DC: The Forest supports mentorship and leadership programs designed in collaboration with interested Tribes to recruit and engage workforce professionals trained as natural resource stewards grounded in culture and tradition to protect the Forest through innovative programs, inclusive leadership, and advancing technology supported by relevant Tribes.)

**Notes: “Steward” is a more appropriate word than “protect”.**

- 32. DEIS: WRKFOR-GOAL-04** (Collaborate with community groups that work with youth in the Northwest Forest Plan area to develop robust understandings of key concepts for participation in community resilience and land stewardship, including receiving curricular and experiential learning about Indigenous and colonial histories and conditions of the land, tribal sovereignty, fire ecology, natural resource workforce development, and climate resilience. Annually coordinate with Tribes within the Northwest Forest Plan area to notify them about opportunities such as the Indian Youth Service Corps program and other opportunities.)

**FAC: 1-29 (and 1-86)** (1-29 DC: Indigenous Youth in the NWFP area develop robust understandings of key concepts for participation in community resilience and land stewardship, including receiving curricular and experiential learning about Indigenous and colonial histories and conditions of the land, Tribal sovereignty, fire ecology, and climate resilience. Annual letters will be sent to Tribes within the NWFP notifying them about opportunities such as the Indian Youth Service Corps program and other opportunities. 1-86 GDL: Indigenous youth in the NWFP area develop robust understandings of key concepts for participation in community resilience and land stewardship, including receiving curricular and experiential learning about Indigenous and colonial histories and conditions of the land, Tribal sovereignty, fire ecology, and climate resilience.)

**Notes: The GOAL should mention Tribal youth, as the corresponding FAC plan component was written specifically about them. If USFS wants to create a more general duplicate pertaining to “community groups that work with youth”, they can put it in another section of the DEIS and retain this one pertaining to Tribal youth.**

- 33. DEIS: WRKFOR-GOAL-05** (Work with Tribes to identify the tribal capacity needs in order for them to engage in collaboration, coordination, and consultation with the Forest Service, and work with Tribes to identify any potential funding sources, including federal sources, for tribal capacity development.)

**FAC: 1-5** (DC: The Forest works with Tribes to determine the Tribal organizational capacity needed to engage in collaboration, coordination, and consultation with the Forest

Service, and works with Tribes to identify sources of funding for Tribal organizational capacity development.)

**Notes: This GOAL should be a DC.**

34. **DEIS: WRKFOR-GOAL-09** (In consultation with Tribes, and through cooperative agreements and funding approaches, increase tribal community workforce opportunities and capacity building in the fields of natural and cultural resources, forest stewardship, fire, ~~cultural and natural resources and traditional~~ cultural properties, and wildlife monitoring on national forests in the Northwest Forest Plan area, focusing on tribal youth and young adults.)

**FAC: 1-91** (GOAL: In consultation with relevant Tribes, and through the use of sovereign-to-sovereign cooperative agreements and funding approaches, increase Tribal community workforce opportunities and capacity building in the fields of natural and cultural resources, forest stewardship, fire, and cultural/natural resources and wildlife monitoring on the Forest, focusing on Tribal youth and young adults, ideally in collaboration with local Tribes and by identifying source of funding available to local Tribal natural resource departments and organizations.)

**Notes: Natural/cultural resources was in there twice- recommend changing one to “traditional cultural properties”.**

For the following **FAC Recommendations with No Corresponding DEIS Plan Components**, we advocate that the USFS either include these in the preferred alternative or adopt these recommendations as leadership commitments or supplemental recommendations. These recommendations are important for improving tribal relations and integral to the successful implementations of all the other Tribal recs and should move forward in some form:

1. **FAC: 1-108 SUIT**: All administratively-designated lands are suitable for co-stewardship by Tribes, upon Tribal request to undertake co-stewardship activities.” This was included in the FAC recommendations, but not in the DEIS Alternative B. It should be brought into the preferred alternative.
2. **1-30 (DC)**: To implement the Tribal Relations Program on each Forest and to ensure that individual Tribal needs are respected and understood, each Forest employs staff with the sole responsibility of stewarding relationships between each Tribe and the Forest. The roles and responsibilities of the Tribal Relations Program Manager include Tribal outreach, staff-to-staff coordination, and collaboration, and are separate from Forest Service staff responsibilities associated with heritage and/or archaeology program tasks.)
3. **1-78 (GDL)**: Upon Tribal request, entities gathering data and providing dispatch information regarding fire ignitions should have the authority to enter into agreements with

such Tribes to protect the privacy and confidentiality of cultural, ceremonial, and other fire use.)

4. **1-92** (GOAL: Upon Tribal request, enter into long-term contracts, master stewardship agreements, and other sovereign-to-sovereign cooperative instruments with Tribes and Tribal entities. Establish a working group of tribal and Forest Service leadership to revise existing agreement templates such that they respect Tribal sovereignty.)
5. **1-111** (MONT: In cooperation with relevant and interested Tribes and according to Tribal knowledge and data sovereignty protocols, conduct monitoring of implementation of the special forest products program in the Forest to ensure that Tribally-important culturally significant resources are harvested in a manner and rate consistent with sustainability.)
6. **1-113** (MONT: In situations where heritage monitoring is required for implementation activities, these activities should include a tribally-designated representative, not just a Forest-designated archaeological monitor.)