



March 10, 2025

Jacque Buchanan, Regional Forester,
Pacific Northwest Region
Jennifer Eberlien, Regional Forester,
Pacific Southwest Region
U.S. Forest Service
333 SW 1st Avenue
Portland, OR 97208-3623

SENT VIA CARA:

[https://cara.fs2c.usda.gov/Public//Comment
Input?Project=64745](https://cara.fs2c.usda.gov/Public//CommentInput?Project=64745)

RE: Northwest Forest Plan Amendment Draft Environmental Impact Statement (#64745)

Dear Regional Foresters Buchanan and Eberlien:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (Draft EIS) for the Northwest Forest Plan (NWFP) Amendment, EIS No. 20240208 (89 Fed. Reg. 90,280 (November 15, 2024)).

The Cowlitz Indian Tribe is a federally recognized Indian Tribe of southwest Washington and northern Oregon. lawilátla (Mount St. Helens) and what is now the Gifford Pinchot National Forest lie within our homelands. Since Time Immemorial, the Cowlitz People have hunted, fished, and gathered across the rivers, valley, and ridges of the western Cascades, following a strategic seasonal round of resource acquisition. Clean air and water, and healthy, harvestable populations of plants and animals are central to our way of life and the survival of our people. We have been stewards of this landscape for millennia, and we remain committed to protecting and restoring it for generations to come.

According to the Purpose and Need for Action in the Draft EIS, there are five areas of focus for the amendment process:

- *Improving wildfire resistance and resilience across the NWFP area;*
- *Strengthening the capacity of NWFP ecosystems to adapt to the ongoing effects of climate change;*
- *Improving conservation and recruitment of mature and old-growth forest conditions, ensuring adequate habitat for species dependent upon mature and old-growth ecosystems and supporting regional biodiversity;*

The Forever People

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- *Incorporating Indigenous Knowledge into planning, project design, and implementation to achieve forest management goals and meet the Forest Service's general trust responsibilities; and*
- *Providing a predictable supply of timber and non-timber products, and other economic opportunities to support the long-term sustainability of communities located proximate to National Forest System lands and economically connected to forest resources.* p. ES-2

Overall, we strongly support the direction to modernize the NWFP. The 1994 NWFP did not anticipate the scope and scale of climate change. Moreover, it lacked respectful and meaningful consultation with Tribes including the Cowlitz, resulting in significant harm to Tribal communities, lands, and resources. In the 1990s, the Cowlitz Indian Tribe was still fighting for federal recognition, which was finally confirmed in 2002. Since then, the Tribe has been working to establish its government, engage in economic development, preserve its cultural traditions and natural resources, and protect its sovereignty.

Robust Tribal inclusion components (categorized in the Draft EIS as Access and Gathering, Biodiversity, Co-stewardship, Forest Stewardship, Indigenous Knowledge, Treaty and Protected Tribal Rights, Awareness and Coordination, and Tribal Workforce) and climate adaptation and resilience strategies should be part of NWFP-related actions going forward. We offer several specific comments on the Draft EIS below:

1) Alternatives under Consideration

In general, we support the plan components of the Proposed Action (Alternative B) but would like to see Tribal inclusion provisions expanded. Specifically, we request that the two Tribal forest stewardship goals (TRIBAL-FORSTW-ALL-GOAL-08-D, TRIBAL-FORSTW-ALL-GOAL-09-D) and potential management approach (TRIBAL-FORST-ALL-PMA-D) found only in Alternative D be added to the Proposed Action:

TRIBAL-FORSTW-ALL-GOAL-08-D: Coordinate with Tribes to promote alternate treatments for protecting rare and listed plants, integrating Indigenous Knowledge approaches with special attention to enhancing and restoring disturbance-dependent plant species like geophytes, plants with bulbs, corms, or tubers, where standard avoidance treatments may impair plant survival. Move towards landscapes supporting traditional Tribal practices, such as large, low-intensity prescribed burns. Table 2-1, p. 2-10

TRIBAL-FORSTW-ALL-GOAL-09-D: For post-disturbance areas, Tribes should be invited to collaborate on designing post-disturbance management prescriptions and plans that integrate Indigenous Knowledge and western science to encourage restoration of

woodlands and resources at gathering sites, protect or enhance conditions at ceremonial sites, and maintain or improve access to culturally important sites and resources. Table 2-1, p. 2-11

TRIBAL-FORSTW-ALL-PMA-D: Silvicultural treatments, including fire, are used to restore and maintain non-forested habitats within moist forest landscapes and promote ecologically and culturally appropriate species such as beargrass and huckleberry. Table 2-1, p. 2-11

To the Proposed Action, we further recommend acknowledging that Tribal stewardship and cultural uses influence moist forest Late Successional Reserves (FORSTW-LSR-MOI-DC-03-D) and adding other Tribal exemptions identified in Alternative D (see Table 2-1).

2) wənáy'x (Huckleberry) and Other Culturally Significant Plants

Alternatives B and C propose a huckleberry-focused potential management approach, which is defined as:

TRIBAL-FORSTW-ALL-PMA-B: To promote huckleberry abundance over the long-term on NFS [National Forest System] lands within the range of the NSO [Northern Spotted Owl] 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 and/or through co-stewardship agreements if possible. Table 2-1, p. 2-11

As we have shared previously with the Forest Service, huckleberry restoration on the Gifford Pinchot National Forest is a high priority for the Tribe. The Cowlitz People have always traveled into the mountains during the summers to pick huckleberries. Before the arrival of European and American settlers and forest management practices, these berry fields were regularly burned to keep trees from growing into the fields and shading berry production. Indigenous Knowledge of how and when to burn was an important resource management tradition. Berry-picking sites were annual locations of family reunions and celebrations, and they remain honored places today.

Reinstating Tribal stewardship of important berry picking sites and taking steps to create new huckleberry habitat are urgently needed. We are pleased to see other provisions that address cultural burning (e.g., FIRE-ALL-GOAL-05, FIRE-ALL-GDL-D, TRIBAL-FORSTW-ALL-DC-09) in the Draft EIS. The Cowlitz Indian Tribe knows that the Berries need the People, just as much as the People need the Berries.

In lieu of TRIBAL-FORSTW-ALL-PMA-B, Alternative D proposes the following potential management approach:

TRIBAL-FORSTW-ALL-PMA-D: Work with interested and relevant Tribes to determine annual restoration actions of First Foods and culturally significant botanical species at a scale meaningful to the Tribes, within the range of the NSO. Complete those restoration actions through coordination with Tribes or through co-stewardship agreements if possible. Table 2-1, p. 2-11

While both Potential Management Approaches above have value, one is specific to huckleberry (TRIBAL-FORSTW-ALL-PMA-B) and the other addresses First Foods and culturally significant botanical species more broadly (TRIBAL-FORSTW-ALL-PMA-D). We ask that the Forest Service ensure that both approaches are thoroughly captured when developing a preferred alternative for the Final EIS. All First Foods and culturally significant plants deserve due consideration.

3) ɫq'ɫ'k (Beaver) Habitat Restoration and Reintroduction

We support provisions for beaver habitat restoration and reintroduction included under all action alternatives (i.e., TRIBAL-BIO-DC-01, TRIBAL-BIO-PMA, CLIMATE-GOAL-02). These provisions rightly acknowledge the critical role of beavers in aquatic and riparian ecosystems. Their natural work of improving the environment ranges from restoring fish habitat and improving water quality to helping to mitigate effects of forest fires and climate change.

For several years, the Tribe has been working collaboratively with the Gifford Pinchot National Forest on a beaver reintroduction project. The Tribe obtains “nuisance” beavers from the lowlands (primarily urban and suburban areas along the Columbia River and tributaries where there are human-wildlife conflicts) and relocates them into suitable, unoccupied habitat on the Forest. This beaver relocation project is one part of a broader suite of Cowlitz Indian Tribe habitat restoration efforts.

4) Indigenous Knowledge

The action alternatives present several desired conditions and standards related to Indigenous Knowledge, including some addressing privacy and confidentiality considerations. There are also objectives that provide opportunities for incorporating Indigenous Knowledge in co-stewardship projects.

We support the concept of incorporating Indigenous Knowledge into Forest Service planning and decision-making processes but underscore the importance of doing so in ways that respect

free, prior, and informed consent and protect confidentiality of sensitive information. What this looks like may be different for each Tribe, and the Forest Service should allow adequate time to ensure effective consultation.

5) Climate Change and Vegetation

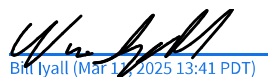
Alternative D includes a guideline that adds consideration of climate change on vegetation when determining appropriate forest stewardship treatments (FORSTW-ALL-GDL-03-D). What information or sources of “climate change projections of potential changes in vegetation” (Table 2-1, p. 2-11) would inform application of this guideline?

The forced removal of Indigenous Peoples and traditional stewardship practices from many areas has greatly harmed Tribal communities and the ecosystems they depend on. This NWFP amendment is a step in the right direction, but it is only the beginning. Tribal inclusion components proposed in the Draft EIS will be meaningful only with continued commitment from the Forest Service, including ongoing consultation and coordination with Tribes, and sufficient staffing and funding behind plan implementation. The Cowlitz Indian Tribe is eager to pursue new co-stewardship and workforce development opportunities on the Gifford Pinchot National Forest that ensure Tribal interests and management goals are addressed.

In conclusion, the Tribe supports adoption of Alternative B as modified by the inclusion of language from other Alternatives identified in these comments, and changes consistent with the priorities explained in the comments. For questions concerning this letter, please contact Christina Donehower, Natural Resources Policy Analyst, at cdonehower@cowlitz.org or (360) 506-1848.

Sincerely,

COWLITZ INDIAN TRIBE



B. Iyall (Mar 10, 2025 13:41 PDT)
William B. Iyall, P.E.
Tribal Chairman

CC: Johanna Kovarik, Forest Supervisor, Gifford Pinchot National Forest
Jody Nickerson-Powell, Community Engagement Staff Officer, Gifford Pinchot National Forest