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March 17, 2025

Re: Draft environmental impact statement for the Northwest Forest Plan amendment

Dear Ms. Buchanan and Ms. Eberlien,

The Sauk-Suiattle Indian Tribe (hereafter, 'Sauk-Suiattle Tribe' or 'Tribe') is submitting these comments on the draft environmental impact statement for the amendment to the Northwest Forest Plan. In summary, the Sauk-Suiattle Tribe **supports adoption of the proposed Alternative D**. However, several remedies to the proposal and to Forest Service priorities must be made:

- 1) We are skeptical the Forest Service has the staffing capacity to implement many components of the proposed plan. **The Forest Service must prioritize positive outcomes such as habitat protection and restoration, including the necessary staffing to implement positive plan components,**
- 2) **Plan components geared toward tribal priorities for habitat restoration should be motivated by wildlife habitat in addition to plants.** Species of high recovery priority for the Sauk-Suiattle Tribe, such as elk, also require functional forest disturbance processes that create and maintain early seral habitat, and
- 3) **Recreation and Tribal access should be split into different plan components, with clarity that the tribal access issues are prioritized** through enforceable standards or guidelines whereas recreation components are goals or potential management approaches.

### Background and setting for our comments

The Sauk-Suiattle Indian Tribe is a Federally-recognized native American tribe and a political successor in interest to certain Tribes and bands that signed the 1855 Treaty of Point Elliott, which reserved for the Tribe the right to hunt, fish and gather within our usual and accustomed territory. The Sauk-Suiattle reservation sits at the junction of the Sauk and Suiattle rivers, two of the largest and most productive tributaries to the Skagit

River, the largest river system draining to Puget Sound and the only river in the lower 48 states that still has all species of wild Pacific salmon and steelhead spawning in its waters. Since time immemorial, the Sauk-Suiattle Tribe has stewarded and utilized the landscapes of our ancestral homeland in northern Puget Sound to support our way of life, and we will continue to steward and use these landscapes far into the future.

Since European-American arrival, our forests and streams have experienced significant degradation and destruction due to mismanagement, resulting in losses of high-quality habitat for the fish, wildlife and plant species we depend upon for cultural and economic sustainability. In recent years, we have made modest progress in restoring lost habitat function along with many valued partners including the U.S. Forest Service. However, significant threats remain and new threats are emerging: climate change, catastrophic fire, larger floods, intensifying recreation and insect outbreaks to name a few. We are encouraged to see many of these issues addressed in the proposed amendment to the Northwest Forest Plan. We are similarly encouraged to see the commitment to meaningful partnerships with Tribes demonstrated by the Tribal inclusion components of the proposed plan. **We support Alternative D of the DEIS because we believe it presents the most opportunities for implementing projects that support recovery of tribal resources in the national forests.** Specifically, the ability of the Forests to implement ecological forestry projects that restore diverse habitats for tribally-valued plant and animal species will be best supported by Alternative D. We support many components of Alternative B as well, although it appears to fall short of some components included in Alternative D particularly related to timber harvest flexibility and development of habitat for first food sources. We do not support Alternatives A or C, which retain many of the problematic dynamics currently plaguing the national forests.

### **The Forest Service has a severe staffing capacity issue and must prioritize plan implementation over additional process**

The level of effort given to this planning process combined with staffing freezes and reductions in local Forests demonstrate that the Forest Service has prioritized process over outcomes and that the proposed plan will be inadequately implemented due to lack of staffing capacity at the Forest level. For example, both Alternatives B and D propose to change the threshold maximum age of stands eligible for timber harvest from 80 to 120 years. The DEIS estimates that this change will result in an increase of 824,000 additional acres of area eligible for timber harvest in Late Successional Reserves alone. This change *could* positively impact Tribal resources if it furthers the goal of habitat restoration for ungulates or is paired with needed access improvements or road network repairs or decommissioning. However, we question whether the increase in area eligible for harvest will result in the implementation of more timber harvests or restoration projects due to staffing capacity limitations at the Forest level. Similarly, proposed objective FORSTW-MTX-MOI-OBJ-01 under Alternative B specifies that at least 10% of young stands in moist forest Matrix will be treated using ecological forestry methods within 10 years of plan approval, while the same objective under Alternative D changes the rate to 20% of young stands in moist forest Matrix lands in the first 10 years. These rates of timber harvest sound like improvements over the current situation, yet we are skeptical they will come to fruition due to de-prioritization of staffing and resources at the Forest level. If 20% of young stands is a realistic rate under Alternative D, why is that rate not also included under Alternative B? If the Alternative B rate of 10% is more realistic, how will

the Forest Service achieve the 20% rate if Alternative D is selected? To fulfill your trust obligations to treaty Tribes, and to enact many of the components included in the proposed amendment, the Forest Service will have to take seriously the staffing capacity problems that we experience in our watersheds and that we know are present at other Forests as well. **The Forest Service must increase local resource staffing to ensure effective implementation of plan components.**

Another concerning demonstration of prioritizing process over product is plan component *TRIBAL-AG-OBJ: 'Within 5 years, work with Tribes to co-develop a long-term strategy to improve tribal access to important cultural places in the NWFP area...'* Access planning should be conducted at the Forest level in partnership with local Tribes. We do not need more regional planning documents that lay out general frameworks for tribal access. We need specific actionable plans for specific areas to preserve and restore tribal access and limit non-tribal access. Restoring Tribal access should be an implementation priority on the ground, today. Moreover, improving tribal access may require additional revenue generation to maintain new or reopened roads and to establish and maintain forest road gates. Will staffing be increased accordingly to adequately implement projects that increase and maintain tribal access?

Similarly, *TRIBAL-FORSTW-ALL-OJB-02 '...calls for each national forest in the NWFP area to develop and implement at least three projects within 5 years in partnership and collaboration with Tribes that support restoration of priority culturally relevant species.'* This is a good component of Alternative B. We think it should remain as an objective or be elevated to a standard. It should not be relegated to goal status as in Alternatives C and D. Again, however, **we are concerned that implementation of this plan component will be inadequate or non-existent if funding is not identified to support projects and staffing is not expanded to meet project demand.**

**Plan components geared toward Tribal priorities for habitat restoration should be motivated by wildlife habitat in addition to plants**

From the DEIS: *'Alternative D also expands plan direction associated with additional tribal plan components geared toward the restoration of protected plants that are also culturally important and which may require disturbance rather than avoidance for restoration'* (p. 2-9). e.g. *TRIBAL-FORSTW-ALL-GOAL-08-D*. While there is nothing wrong with including plant species restoration as a goal, the Tribe believes plan components geared toward tribal priorities for habitat restoration should be motivated by wildlife habitat in addition to plants. Species of high recovery priority for our Tribe, such as elk, also require functional forest disturbance processes that create and maintain early seral habitat.

Similarly, *TRIBAL-FORSTW-ALL-PMA-D* suggests that *'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.* This is a good addition to Alternative D and should be retained. However, we suggest that forage species for wildlife of Tribal conservation concern, such as elk, be included as motivations for this PMA.

Related to issues of species and ecosystem restoration is the topic of assisted migration. Plan component *CLIMATE-PMA-01* states that, *'In response to increased drought stress, implement adaptation tactics that increase resilience of forests to drought, including thinning to favor drought-resistant species, and that foster genetic and phenotypic diversity, including protecting trees adapted to water stress and collecting seed adapted to future conditions.'* Management tactics such as assisted migration may indeed prove beneficial to tribal resources and their ecosystems, particularly where they are successful in propagating Tribally-valued species despite environmental change. However, the risks associated with assisted migration should not be ignored and practitioners should be encouraged to follow best management practices and consult with Tribal and other experts during project development.

**Recreation and Tribal access should be split into different plan components, with clarity that the Tribal access issues are prioritized**

Plan component *ECONSUST-DC-02* envisions that *'Recreation activities across national forests within the Northwest Forest Plan area contribute to the sustainability of the cultural, social, and economic values of local communities and Tribes. This is achieved by providing recreation opportunities that meet the needs of populations underserved by public lands recreation and contribute to stability and growth in local communities and economies.'* However, in many cases recreation opportunities for the general public are in direct conflict with Tribal traditional and cultural uses, including treaty reserved hunting and gathering. While including goals to enhance recreation may be appropriate in places, it is critical that Tribal rights to access and use traditional areas are prioritized. We suggest splitting recreation and tribal access into different plan components, and **making clear that the Tribal access issues are prioritized through enforceable standards or guidelines** whereas recreation components are goals or potential management approaches.


**Summary**

In conclusion, we support the speedy ratification of the Northwest Forest Plan amendment. Most components of Alternative D should be retained and modified as we have suggested in this letter. No action (Alternative A) and Alternative C are not acceptable as they will lead to further mismanagement and degradation of the resources we depend upon. **Critically, the Forest Service must remedy the severe capacity problems that make much of the implementation of this plan doubtful by prioritizing staffing and projects at the Forest level.** Regardless of which alternative or parts of alternatives are chosen (B or D), it is critical that the Forest Service finalize this amendment. The status quo is intolerable, although we have been tolerating it for many years. It is critical these updates are enacted for the health of the ecosystems contained within and supported by the national forests and for the treaty-reserved resources we depend on.

We assume revisions to the Mount Baker-Snoqualmie Forest Land and Resource Management Plan will follow ratification of the amendment to the Northwest Forest Plan, and request early engagement in that planning process as well.

We look forward to continuing to work with the Forest Service at all levels to ensure the wise management of our natural resources now and into the future.

Sincerely,

  
Allen Price (Mar 17, 2025 13:40 PDT)

Allen Price  
Sauk-Suiattle Natural Resources Director

Cc: Nino Maltos II, Sauk-Suiattle Tribal Chairman  
Michael Wolten, SSIT Natural Resources Policy Coordinator  
Gus Seixas, SRSC Senior Forests and Fish Scientist  
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# SSIT comment letter about Northwest Forest Plan amendment

Final Audit Report

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