Lummi Indian Business Council

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'Working together as one to Preserve, Promote and Protect our Sche Lang en'

March 27, 2025

USDA Forest Service
Attn: Jacque Buchanan, Regional Forester, Pacific Northwest Region; Jennifer Eberlien, Regional Forester, Pacific Southwest Region; Kristine Harper, Regional Tribal Relations Specialist, Pacific Northwest Region
1220 SW 3rd Avenue
Portland, OR 97204

RE: Lummi Nation's comments to the Draft Environmental Impact Statement (DEIS) for the amendment to the Northwest Forest Plan.

Dear Ms. Buchanan, Ms. Eberlien, and Ms. Harper,

INTRODUCTION

The Lummi Nation submits this letter in response to the Northwest Forest Plan (NWFP) Amendment Draft Environmental Impact Statement (DEIS). Our tribe, located in Whatcom County, Washington State, has stewarded these lands since time immemorial. The Mount Baker-Snoqualmie National Forest, including the Nooksack and Skagit rivers systems are within the NWFP amendment area and are an integral part of our ancestral homelands. These lands not only provide sustenance and spiritual grounding but are critical to the ecological balance of the region. Our stewardship practices have preserved these ecosystems for millennia, and our continued involvement is essential to ensuring their resilience. The First Foods that thrive in these forests, such as many of those on the attached list, sustain not only our diets but also our ceremonies and ecological stewardship traditions.

We urge the Forest Service to adopt the amendment components from both Alternatives B and D that most strongly support recovery of tribal resources in the national forests of the Pacific Northwest. Specifically, we support the proposed amendment recommendations that provide clear guidance for individual forests to work with local tribes in meeting both forest and tribal resource objectives and increase the health and diversity of native plant and animal species. However, we do have some concerns with the amendment alternatives. None of the proposed alternatives adequately protect culturally significant plants and areas, while also ensuring access by the tribes to these areas. Additionally, we are concerned if there will be sufficient resources at the local forest level to implement many of the restoration projects and goals envisioned within the alternatives.

Working with local tribes

Consultation and engagement with local tribes is critical toward meeting multiple stewardship objectives described in the DEIS, and we support the explicit recognition of that in both Alternatives B and D. Generally, we favor the amendment components included in Alternative D as this alternative represents a more complete and robust set of objectives and guidance for tribal inclusion than Alternative B. However, we recognize that many elements included in Alternative B are also worthy of inclusion in the final

amendment, and in some situations may even be preferable given the unique conditions of each forest and the needs and priorities of local tribes.

For example, Alternative B includes guidance to annually increase populations of culturally significant plants on 2,000 acres across the NW Forest Plan area (TRIBAL-FORSTW-ALL-OBJ-03-B), while Alternative D instead calls for 10 such projects across the NW Forest Plan area (TRIBAL-FORSTW-ALL-OBJ-03-D). This distinction, area of restoration vs count of projects, appears arbitrary. Depending on individual tribal needs and capacities and the conditions within each forest, either approach may be the most appropriate option for that given situation. Consider adopting an objective in the final amendment that includes the possibility of either/or objective applying, or some combination of the two. Likewise, while there can be real value in setting specific targets for the number of projects each forest develops and implement with local tribes (TRIBAL-FORSTW-ALL-OBJ-01-B), we think the emphasis should always be for forests to collaboratively work with partner tribes when developing and implementing projects that restore priority culturally relevant species (TRIBAL-FORSTW-ALL-OBJ-06-D). We don't see why those two objectives are contained within different alternatives, both should be included in the adopted amendment. Each forest covered under the NW Forest Plan represents unique circumstances and opportunities and final language in the amendment should provide space and opportunity for tribes and forests to consider a full range of potential projects, at a variety of scales, when working together collaboratively.

Increasing biodiversity

We generally support elements of the amendment that allow for more active management of Late Successional Reserves (LSRs) by giving Forest Supervisor(s) authority to review and approve thinning and other silvicultural treatments prior to NEPA review (FORSTW-LSR-PMA-D). We also support increasing the threshold maximum stand age eligible for timber harvest in LSRs from 80 to 120 years (FORSTWL-LSR-MOI-STD-O1-B and FORSTWL-LSR-MOI-STD-O1-D), so long as prescriptions in these older stands are consistent with meeting LSR goals and are paired with needed access improvements or road network repairs or decommissioning. We think more active management of the LSRs and opening up more areas to harvest, if done appropriately, represent opportunities to create more climate resilient forests, reduce wildfire risks, and improve habitat, especially foraging and cover habitat for ungulates and other wildlife species important to tribes. To this end, we support extending the use of the ecological forestry methods recommended for matrix lands (FORSTWL-MTX-MOI-OBJ-O1-B/FORSTWL-MTX-MOI-OBJ-O1-D) to LSRs when managing these older stands.

Tribal access to traditional areas

We are concerned about a lack of guidance in any of the alternatives to constrain impacts of recreational activities on resources of important to tribes, including those reserved by treaty such as hunting, fishing, and gathering. We urge the Forest Service to include in the final amendment language that protects traditional areas from recreational impacts, while prioritizing tribal access to those areas through enforceable standards or guidelines. The amendment and the NW Forest Plan overall would be greatly improved if recreational and tribal access were split into different plan components in order to give tribal access issues the proper attention they deserve and require. We urge the Forest Service to engage with western Washington tribes to develop standards and guidelines that protect traditional gathering and other culturally significant areas on PNW national forests from further degradation, while providing clear guidance that facilitate tribal access to these areas.

Resource availability and allocation

Many of the components contained within Alternatives B and D represent clear improvements to the NW Forest Plan. We have serious concerns though whether there will be sufficient resources at the local forest level to adequately implement many of these recommendations, particularly those components that focus on restoring culturally significant plants. Even with the streamlined timber sales approval process included in Alternative D and in the recently published Executive Order that expands American timber production, we are concerned there will not be enough resources available to implement timber harvest prescriptions that include restoration elements and road maintenance work. We urge the Forest Service with this amendment and in the management of national forests in the PNW generally to prioritize habitat protection and restoration when allocating staff to and within local forest offices. The Forest Service has a treaty trust responsibility to protect and restore these forests to healthy conditions as they are the traditional lands of the tribes. This obligation needs to be prioritized within the PNW National Forests, and we look forward to continuing to work with the Forest Service, at both the regional and local forest levels, to realize this goal.

Sincerely,

Merle Jefferson, Director,
Lummi Natural Resources Department

cc: LIBC / LNR internal routing

enclosure

Traditional Coast Salish Foods

If you look at what people ate five or six generations ago on an annual basis, there are hundreds of types of foods. Research now is showing that most Americans eat less than twelve foods on a regular basis. In this very short period of a couple of generations we've gone from an incredibly complex diet, eating with the seasons, eating many types of foods, to eating just a few.
— Elise Krohn, traditional foods specialist, Northwest Indian College

PLANTS
Acorn, mountain ash, bearberry, bedstraw, biscuit root, wild blackberry, bladderwrack, blueberry, bulrush, camas, candy flower, wild carrot, cattail, bitter cherry, chokecherry, wild cherry, redcedar, yellow cedar, chickweed, clover, pacific crabapple, cranberry, currant / golden currant, dandelion, dogwood, elderberry, bracken fern, lady fern, licorice fern, ostrich fern, spiny wood fern, Douglas fir, wild ginger, gooseberry, goosefoot, Oregon grape, hackberry, hazelnut, western hemlock, horsetail, huckleberry, bullwhip kelp, kinnikinnick, knotweed, lamb's quarters, legume(s), miner's lettuce, lily root, mustard, mushrooms, nettle, nightshade, Hooker's onion, nodding onion, wild onion, nori, nutmeat, Indian plum, purslane, blackcap raspberry, raspberry, wild rose ,salal, salmonberry, seablite, seaweed, serviceberry, soapberry, spruce, coastal strawberry, wild strawberry, woodland strawberry, sweetgrass, thimbleberry, ulva, vetch, violet ,Wapato, watercress, devil's club

BIRDS
Albatross, alcid, bufflehead, canvasback, American coot, cormorant, American crow, dove, ruddy duck, bald eagle, barrow's goldeneye, common goldeneye, Canada goose, brandt, eared grebe, horned grebe, pied-billed grebe, western grebe, blue grouse, ruffed grouse, gull, harrier, hawk, great blue heron, belted kingfisher, common loon, pacific loon, red-throated loon, yellow-billed loon, mallard duck, common merganser, red-breasted merganser, common murre, marbled murrelet, owl, pelican, pigeon, northern pintail, tufted puffin, California quail, rail, sandpiper, lesser scaup, black scoter, surf scoter, white-winged scoter, shearwater, trumpeter swan, tundra swan, wild turkey, turkey vulture, American wigeon, pileated woodpecker

MAMMALS
black bear, American beaver, bobcat, Townsend's chipmunk, cougar, coyote, deer, elk, mountain goat, pocket gopher, snowshoe hare, eastern cottontail, Canada lynx, mink, coast mole, moose, deer mouse, mountain beaver, muskrat, North American river otter, Dall's porpoise, raccoon, rat-eared seal, hair seal, harbor seal, striped skunk, squirrel, meadow vole, Steller sea lion, southern red-backed vole ,wapiti, weasel, whale, grey wolf

REPTILES & AMPHIBIANS
Western pond turtle, frogs (various)

FINFISH
Northern anchovy, candlefish, smelt / hooligan, chub mackerel, bluefin tuna, codfish, pacific cod, spiny dogfish, wolf eel, blenny (various small), flatfish, lefteye flounder, righteye flounder, starry flounder, pacific hake, blenny, pacific halibut, pacific herring, lingcod, kelp greenling, red Irish lord, plainfin midshipman, Northern pike minnow, peamouth, pile perch, surf perch, shiner perch, poacher, walleye pollock, spotted ratfish, ray, rockfish, sablefish, Chinook salmon, chum salmon, Coho salmon, pink salmon, sockeye salmon, steelhead/rainbow trout, cutthroat trout, Dolly Varden char, Bulltrout

char, roe of salmon, trout, and char, pacific sanddab, sea lamprey, river lamprey, scorpionfish, cabezon, buffalo sculpin, great sculpin, pacific sculpin, staghorn sculpin, roughback sculpin, blue seaperch, striped seaperch, shark, skate, smelt, C-O sole, curlfin sole, Dover sole, English sole, rock sole, green sturgeon, white sturgeon, largescale sucker, pacific tomcod, mountain whitefish

SHELLFISH & OTHER MARINE LIFE
acorn barnacle, gooseneck barnacle, Puget Sound giant barnacle, thatched barnacle, gumboot chiton, chiton, geoduck clam, horse clam, bent-nose clam, butter clam, California butter clam, gaper clam, inconspicuous macoma clam, littleneck clam, pacific coast clam, sand clam, softshell clam, Venus clam, Jackknife /razor clam, basket / heart cockle, Alaskan king crab, Dungeness crab, kelp crab, helmet crab, red rock crab, Puget Sound king (box) crab, purple / green shore crab, dogwhelk, channeled dogwinkle, emarginate dogwinkle, frilled dogwinkle, oyster drill, limpet, blue mussel, California mussel, Olympia oyster, pacific octopus, squid, checkered periwinkle, Sitka periwinkle, sand dollar, giant pacific scallop, Hind's scallop, pink scallop, rock scallop, moon snail, rock snail, sea snails, serpulid worm, pink shrimp, coon-striped shrimp, spot shrimp, broken-back shrimp, hooked slipper shell, wrinkled slipper shell, purple sea urchin, red sea urchin, green sea urchin, vitrinella, dire whelk, purple whelk, short-spired whelk, wrinkled purple whelk, red sea cucumber, pinto abalone, Alaska jingle shell

This list of nearly 300 food sources was compiled from a 2003 survey of 130 archaeological sites in King, Kitsap, and Snohomish counties, and information collected by Northwest Indian College from ethnographic accounts and Coast Salish elders, hunters, fishermen, and gatherers.
Courtesy of the Burke Museum and Elise Krohn

Traditional Foods
Native peoples gathered and hunted for their food. They harvested only what they needed, respecting and preserving nature's balance.

Fish & shellfish
Coast Salish tribes ate clams in great quantities. Women gathered them in open-weave baskets tied to their backs. Clams were smoked or strung on cords to dry, preserving them for winter and as prized items for trade. Fish, another important protein source, were speared or caught in nettle-fiber nets.

Plants
Plants added essential vitamins and minerals to the coastal diet. Arrowhead (Wapato) grew in marshes, its egg-size bulb nutritious and sweet. Nettle leaves were used in soup or tea, dandelion root savored raw or boiled. In spring, bracken fern blanketed March Point, along with the prized onion-like bulb of blue camas.

Berries
Berries were a staple of the Coast Salish diet—salmonberries, thimbleberries, huckleberries, salal berries, and more. They were enjoyed fresh or dried in the sun or on cedar bark over a fire. Others were mashed and shaped into cakes able to be stored indefinitely in ground pits and reconstituted with water.

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