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Title: Forest and Conservation Program Manager
Comments: March 6, 2025

Ms. Nicole Aikman,

Forest and Conservation Program Manager, Port Gamble S'Klallam Tribe

31912 Little Boston Rd. NE Kingston, WA 98346

Re: Northwest Forest Plan Amendment DEIS Comments:

The Port Gamble S'Klallam Tribe (hereafter "PGST" or "the Tribe") is a federally recognized Tribe. Along with the other signatories to the 1855 Treaty of Point No Point, the Tribes is a co-manager of the natural resources within our ceded areas, with the common goal of managing and preserving natural resources for the benefit of current and future generations.

We are writing to support Alternatives B and D. The Tribe does not support Alternative C or the No Action alternative.

We recognize that Alternatives B and D are distinct and offer different management approaches and pathways to improving the health and resilience of Forests under the Northwest Forest Plan. However, both Alternatives are a significant improvement from the current Plan. The improvements include:

1. greater emphasis on improving overall forest conditions and health across all age classes through proactive restoration.
2. greater emphasis on fire preparedness and fuels reductions.
3. increased adaptability to the effects of climate change, with greater ability to implement adaptive management.
4. supporting local economies through increased timber production, while being guided by conservation and long-term ecosystem health goals; and
5. significantly improving tribal engagement throughout project planning and implementation.

Additionally, we commend the Federal Advisory Committee for the inclusion of tribal members on the Committee and the inclusion of tribal inputs throughout this process.

Alongside our strong support for Alternatives B and D, we must raise a few concerns that have not been fully addressed. We hope the concerns below can be addressed regionally until they are fully addressed in a future plan update. Our concerns are as follow:

1. The impacts from exploitative gathering of forest products (berries, mushrooms, cedar boughs, etc.), and efforts to reduce these practices, are not sufficiently addressed. The level of use and exploitation has become so pronounced in many areas that the ability of tribal citizens to exercise their treaty right to gather is severely diminished, and we have conservation concerns.
2. The harmful impacts of recreational use, and plans to reduce these impacts are not sufficiently addressed. In some areas the high levels of use are resulting in ecological damage, such as erosion, the displacement of wildlife, overharvest, and more. The impacts are frequently harming Treaty reserved rights to fish, hunt and gather. We would like the issues around gathering and recreational impacts to be addressed at the largest scale possible to ensure that impacts are not shifted between Forests if one Forest unilaterally changes their management approach.
3. We are concerned that funding for the implementation of treatments may be insufficient. We would like greater emphasis on implementing approved projects, instead of beginning new NEPA processes while not implementing projects that have already undergone NEPA review and approval.

In summary, we recognize that Alternatives B and D of the Northwest Forest Plan Amendment provide substantive improvements over the current Plan and will support either.

Sincerely,

ATTACHMENT-LETTER TEXT: NWFP DEIS comment letter.PDF; This is the same content that is coded in text box; it was also included as an attachment