

Data Submitted (UTC 11): 3/6/2025 5:00:00 AM
First name: Russell
Last name: Attebery
Organization: Karuk Tribe
Title: Chairman
Comments: Ayuk[jicirc]i (Greetings) NWFP Amendment Team,

Please see attached letter and appendices for the official comments and recommended edits/revisions from the Karuk Tribe.

Y[ocirc]otva (Thank you)

March 5, 2025

USDA Forest Service

Attn: Northwest Forest Plan Amendment DEIS Comments 1220 SW 3rd Avenue

Portland, OR 97204

Re: NWFP Draft Environmental Impact Statement (Draft EIS) Comments Ayukii (Greetings) U.S. Forest Service
NWFP Amendment Team,

The Karuk Tribe submits this letter in response to the Northwest Forest Plan (NWFP) Amendment Draft Environmental Impact Statement (Draft EIS).

Our Tribe, located in the Klamath Region, has stewarded over a million acres of land since time immemorial. The Six Rivers and Klamath National Forests within the NWFP amendment area, overlap with our aboriginal territory. These lands are critical to the ecological balance and economy of the region.

Thriving with an economy supported by rich natural endowments, Karuk forest management has shaped the region's ecological conditions for millennia and continues to do so. Our management practices have cultivated the landscape for millennia, and our continued involvement is essential to ensuring their resilience. Stewardship of these resources are Tribal rights that have never been ceded.

The NWFP amendment represents a pivotal opportunity to address the challenges that have intensified since the Plan's inception in 1994. This process is an opportunity to address the lack of involvement of Tribes in the original NWFP and to implement meaningful commitments to Tribal sovereignty and shared management. The federal government has a trust responsibility to honor Tribal sovereignty and to ensure that Tribes are full partners in managing the lands and resources that are our ancestral inheritance.

We recognize the efforts of the Federal Advisory Committee (FAC), whose recommendations to the USFS reflect an important step toward modernizing the NWFP. In particular, appreciate the FAC's focus on Tribal relations and fire resilience. We also appreciate the Affiliated Tribes of Northwest Indians (ATNI) Resolution #24-07 which provides a unified and collective framework for Tribal involvement in this process, emphasizing the centrality of Tribal sovereignty and treaty rights in forest management. The Karuk Tribe appreciates the steps taken to incorporate Tribal input through roundtables, consultations, and the Draft EIS process, including the Yreka Roundtable which we co-hosted as well as the involvement of our staff in the drafting process.

The Draft EIS includes many important measures to expand Tribal participation across the NWFP area. By supporting Tribal leadership and advancing co-stewardship/co-management, the NWFP can fulfill its promise to build economic resilience and sustainability for future generations. Many of the proposed Amendment's Tribal-specific plan components should be applied to the NWFP, but also beyond - into how the US Forest Service carries out its trust responsibility with all Tribes.

However, much work remains to fully integrate Tribal treaty and other rights and trust responsibility obligations into the NWFP amendment. This letter highlights the areas where the Draft EIS falls short and provides specific recommendations to strengthen the Plan.

In our area, the lack of Tribal and other land management practices have resulted in significantly increased wildfire risk. Therefore, we strongly encourage the USFS to include the FAC's Tribal Inclusion recommendation preamble in the Final EIS and Record of Decision, with special emphasis on the section:

"Over a century of fire suppression, coupled with regulatory restrictions, and removal of Indigenous practitioners and practices (including cultural fire) across the landscape have led to today's increased risks from catastrophic wildfire and has also created structural barriers and mechanisms preventing Indigenous peoples from enacting sustainable stewardship."

Regarding the Alternatives, we believe that Alternative B's approach to Tribal relations is most likely to be successful in meeting the Forest Service's goals, in that it includes concrete requirements that national forests must meet within specified timeframes. Collectively, these components represent critical steps toward fostering meaningful government-to-government relationships and ensuring that Tribes can actively participate in forest management. (Please note, while the Amendment uses the term "Tribal Inclusion", we use the term "Tribal Relations," as the political status of Tribes, the unique and important government-to-government relationship we

have with the U.S. federal government, and the legal implications of the trust responsibility are not related to "inclusion" policies or any DEi context. See Secretarial Order 3416 Sec. 6d.). Specifically, Alternative B will better enable Tribal fire and forest management while reducing the regulatory burden around things like cultural burning, Endangered Species Act compliance, and co-stewardship.

Thus, we recommend the USFS adopt most of Alternative B's Tribal plan components (Goals, Desired Conditions, Objectives, Standards, Guidelines, and potential Management Approaches) as written in the Draft EIS into the preferred alternative, with the recommended changes and additions mentioned in Appendix A to this letter. Though we have not had the time to review every part of the amendment, we recommend USFS adopts the language included in the Alternative B Tribal Inclusion plan components as written in the Draft EIS for all Tribal plan components NOT mentioned in Appendix A.

Additionally, there are some plan components included within Alternative D, which we appreciate and would like to also see incorporated into the preferred alternative, and/or combined with plan components already included in Alternative B. We describe these in Appendix B to this letter.

We are also concerned that the effects analysis in the Draft EIS provides insufficient discussion of Tribal plan components, as required by the National Environmental Policy Act. These components collectively form the necessary framework for managing for wildfire resilience based on the best available science, honoring treaty and Tribal rights, fostering workforce development, and improving the health of our forests. Furthermore, the Draft EIS should explicitly highlight the major differences between the No Action Alternative and Alternative B regarding Tribal Relations, as this comparison is essential for understanding how the Proposed Action would advance the federal Trust responsibility, support Tribal sovereignty and impact the environment. We urge the Forest Service to collaborate with Tribes to provide a more comprehensive analysis that reflects the breadth and importance of the proposed Tribal-specific plan components. This will ensure that the final analysis accurately captures the scope of Tribal priorities and the impacts of the proposed amendment on Tribes.

Lastly, to address the shortcomings in the Draft EIS and ensure the NWFP amendment aligns with Tribal priorities and responsibilities, we provide the following recommendations:

1. Formalize Enforceable Shared Stewardship & Co-management Agreements:

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* Establish binding shared stewardship and co-management agreements with Tribes that support Tribal decision-making authority, measurable outcomes, and include funding. These agreements must recognize Tribal sovereignty and Tribal management authority.

2. Integrate Indigenous Knowledge (IK) into Forest Management:

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* Require consultation with Tribes at all stages of management, from planning to implementation and monitoring.

* Establish a formal IK consultation process, co-developed with Tribes, ensuring IK is applied with respect, consent, and in recognition of tribal sovereignty.

3. Protect Tribal Data Sovereignty and Sensitive Information

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* Confidentiality provisions must safeguard sensitive Tribal information and ensure that its use aligns with the principles of Tribal sovereignty and self-determination.

4. Address Wildfire Risks with Tribal-Led Strategies:

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* Support and accommodate Tribal fire stewardship and use with measurable targets to reduce wildfire risk and enhance ecosystem resilience.

5. Foster Sustainable Economic Opportunities:

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* Support the Tribal fix to the Good Neighbor Authority to ensure that Tribes can retain receipts from timber sales and reinvest that income in revenue-generating funds to sustain the workforce necessary for forest and fire management.

6. Advance Adaptive Management and Flexibility:

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* Enable Tribes to implement their own land management standards and guidelines, with provisions allowing these standards to supersede NWFP components where necessary to support Tribal sovereignty and fulfill trust obligations. This could be through the establishment of Territorial-scale Management Areas, or the application of Integrated Resource Management Plans at the territorial scale.

In summary, the Karuk Tribe urges the U.S. Forest Service to take the following actions:

1. Revise the Draft EIS to incorporate the recommendations outlined in this letter into the preferred alternative, ensuring that Tribal sovereignty, treaty and Tribal rights, fulfilling the trust responsibility, and shared stewardship are central to the final NWFP amendment (See Appendices A & B).
2. Improve consultation processes and the implementation of the U.S. Forest Service's trust responsibility within and beyond the NWFP area by implementing comprehensive, government-to-government protocols that ensure early and continuous engagement with Tribes throughout all stages of planning, implementation, and monitoring.
3. Schedule a meeting with members of our Natural Resources Department and Tribal Council by April 17, 2025 (one month after the comment period closes) to discuss these recommendations in detail and establish a roadmap for addressing our concerns in the Final Environmental Impact Statement (FEIS).

We respectfully request a written response from the USFS within 30 days acknowledging receipt of this letter and outlining next steps for addressing the issues raised. Please contact Colleen Rossier (crossier@karuk.us) with such response as well as any questions or follow up.

The Karuk Tribe thanks the U.S. Forest Service for the opportunity to participate in this critical process. We appreciate your attention to our concerns, your efforts to better implement the federal trust responsibility and to honor our Tribal rights, and your willingness to collaborate to better manage the lands and resources that are our ancestral inheritance.

Yootva (Thank you),

[] Karuk Tribal Chairman

ATTACHMENT-Letter text: US FS Northwest Forest Plan Draft EIS signed.pdf; this is the same content that is coded in text box above; it was originally included as an attachment

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, [start red text] in populations sufficient to fulfill their ecological function[end red text] [start strikeout] and [end strikeout] to benefit ground water, surface water, and aquatic habitat complexity to support the conservation and recovery of imperiled aquatic species [start red text and strikeout] in populations sufficient to fulfilltheir ecological function.[end red text and strikeout])

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).

1. 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 [start red text] setting [end red text] Limited Operating Periods [start red text] and Critical/Suitable Habitat Designations [end red text]) 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).

1. DEIS: BIO-GDL-01 (To honor treaty and other tribal rights, Forest Service staff in the plan area should [start red text] prioritize early engagement [end red text] and sustain staff to staff [start red text] consultation [end red text], 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.

1. DEIS: BIO-GDL-02 (To ensure that Indigenous Knowledge is incorporated to the [start red text] greatest possible extent [end red text] [start strikeout] permitted by law[end strikeout], 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, [start red text]Critical and Suitable Habitat Designations [end red text] 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".

1. DEIS: BIO-PMA (2) (Work with relevant federal, state, [start red text] and tribal [end red text] 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.

1. DEIS: BIO-PMA (3) (Work with USFWS and NOAA-NMFS [start red text] as well as relevant Tribes [end red text] 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.

1. DEIS: COSTW-OBJ-01 ([start red text] At Tribal request, work with relevant Tribes to co[end red text]-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, [start red text] and [end red text] collaborat[start red text]ive[end red text] and cooperat[start red text]ive management [end red text] protocols [start red text]and processes[end red text].)

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.

1. DEIS: COSTW-[start red text]GDL[end red text]-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.

1. DEIS: COSTW-PMA (1) (Encourage the inclusion of Tribes at the beginning of project development and prioritization of workplans, [start red text] including annual and longer-term programs of work [end red text].)

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.

1. DEIS: FORSTW-DC-02 (Vegetation types and conditions [start highlight] enable ecological and cultural processes [end highlight] 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, [start highlight] as well as enabling ecological and cultural processes including fire use and stewardship practices [end highlight], 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.

1. 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?

1. 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?

1. 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

1. 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"

1. DEIS: FORSTW-OBJ-01 (Within 5 years, each national forest in the Northwest Forest Plan area should [start red text] jointly [end red text] 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".

1. 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 [start red text] identified through consultation with interested Tribes, [end red text] 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.

1. DEIS: FORSTW-OBJ-04 ([start red text] Within two years, [end red text] 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 [start red text] while protecting Tribal data sovereignty [end red text]. Develop an implementation strategy for NHPA section 304 on confidentiality (54 USC [sect] 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 [sect] 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."

1. DEIS: FORSTW-STD-04 (Tribes shall have access to areas that provide an opportunity to practice traditional, cultural, and religious activities [start red text][start strikeout], consistent with federal law[end red text][end strikeout]. 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.

1. 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).

1. 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.

1. 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"

1. DEIS: FORSTW-PMA (6) [start red text] In consultation, coordination and collaboration with relevant Tribes, s[end red text]ilvicultural 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.

1. 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.

1. 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 [start red text][start strikeout] to the extent permitted by law[end red text][end strikeout]. Honor tribal data and knowledge sovereignty by considering free, prior, and informed tribal consent and protecting culturally sensitive information [start red text][start strikeout] to the extent permitted bylaw[end red text][end strikeout]. 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?

1. 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 [start red text][start strikeout] to the extent consistent with federal law[end red text][end strikeout].)

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?

1. DEIS: IK-STD-03 (National forests in the Northwest Forest Plan area shall[~~start red text~~][~~start strikeout~~], to the extent allowed under the law, [~~end red text~~][~~end strikeout~~] 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?

1. 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.

1. DEIS: TPTR-STD-04 (Upon a Tribe's request, [start highlight]strive to enter into[end highlight] 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.

1. 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. [start red text]Determine the sufficiency of consultation efforts by requesting Tribal feedback on an annual basis.) [end red text]

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.

1. DEIS: WRKFOR-GOAL-01 (Work with Tribes to explore available avenues [start red text] such as administrative land transfers [end red text] 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.

1. 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 [start red text][start strikeout]protect [end strikeout] steward [end red text] 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".

1. 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.

1. 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.

1. 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, ~~start red text~~~~start strikeout~~ cultural and natural resources and ~~end strikeout~~traditional ~~end red text~~ 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 [start highlight] Recommendations with No Corresponding DEIS Plan Components [end highlight], 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 SUI: 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.)

1. 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.)
2. 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.)
3. 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.)

ATTACHMENT-Letter text: Appendix A Karuk.pdf; this is the same content that is coded in text box above; it was originally included as an attachment

Appendix B: Incorporating Alternative D Plan Components into the Final Preferred Alternative

We support the inclusion of the following Alternative D Tribal-specific plan components in the Preferred Alternative (these were not included in Alternative B) in addition to the Alternative B plan components as discussed previously:

1. (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 toward landscapes supporting traditional Tribal practices, such as large, low-intensity prescribed burns.

Notes: compare to alt B, Goals FIRE-ALL-GOAL 1, which has similar language regarding post-fire disturbance. We support including this alternative (TRIBAL- FORSTW-ALL-GOAL-08-D), which is more specific and applies to all disturbance types, in the preferred action.

1. (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.

Notes: This is important and should be included in the preferred action.

1. (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.

Notes: We support the inclusion of this in the preferred action but are wondering why it is focused on moist forests specifically? Can we include a similar one for dry forests or make this applicable across all forest types?

For the following recommendations with [start highlight] contrasting plan components in Alternatives B and D, [end highlight] we recommend the following (in "notes" below the two versions of the plan components):

1. Huckleberries v. First Foods

Alternative B: (TRIBAL-FORSTW-ALL-PMA-B): To promote [start highlight] huckleberry [end highlight] abundance over the long-term on NFS lands within the range of the NSO 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.

Alternative D: (TRIBAL-FORSTW-ALL-PMA-D): Work with interested and relevant Tribes to determine annual restoration actions of [start highlight] First Foods and culturally significant botanical species [end highlight] 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.

Notes: We recommend including both in the preferred alternative. If it's important to include a huckleberry-specific one (alt B), we should also include a more general one (alt D) that refers to all cultural use species, e.g. "first foods and culturally significant botanical species".

2. Number of Acres vs. Projects

Alternative B: (TRIBAL-FORSTW-ALL-OBJ-03-B): 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 by [start highlight] 2,000 acres [end highlight] across the Northwest Forest Plan area.

Alternative D: (TRIBAL-FORSTW-ALL-OBJ-03-D): Annually implement work 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 tribal consultation on [start highlight] 10 projects [end highlight] across the Northwest Forest Plan area.

Notes: We recommend combining these so that the preferred alternative include both acreage and project targets> e.g. on at least 10 projects covering at least 2,000 acres total.

3. Number of Projects

Alternative B: (TRIBAL-FORSTW-ALL-OBJ-01-B): [start highlight] Within 5 years [end highlight], each national forest in the Northwest Forest Plan area should develop and implement [start highlight] at least three projects [end highlight] in partnership and collaboration with Tribes that support restoration of priority culturally relevant species.

Alternative D: (TRIBAL-FORSTW-ALL-GOAL-06-D): Collaborate with Tribes to jointly develop and implement programs and projects that support the restoration of priority culturally relevant species.

Notes: The Alternative B language regarding 5 years and 3 projects should be included in the preferred alternative as an objective.

4. Number of Areas and Timeframe

Alternative B: (TRIBAL-FORSTW-ALL-OBJ-02-B): Through engagement and consultation with interested Tribes, develop techniques and approaches to implement forest restoration, enhancements, fuels reduction, or maintenance actions [start highlight] in at least three areas [end highlight] of tribal importance, as jointly determined by Tribes and the national forests in the Northwest Forest Plan area [start highlight], on a yearly basis following plan approval.[end highlight]

Alternative D: (TRIBAL-FORSTW-ALL-GOAL-07-D): Through engagement and consultation with interested

Tribes, develop techniques and approaches to implement forest restoration, enhancements, fuels reductions, or maintenance actions in areas of tribal importance, as jointly determined by Tribes and national forests in the Northwest Forest Plan area.

Notes: We support the objective from alt OBJ B regarding 3 areas on a yearly basis in the preferred alternative.

Apart from the Tribal inclusion recommendations, [start highlight] we also support the addition of much of Alternative D plan components to Alternative B as the preferred alternative. [end highlight] The Draft Plan components provided in "Wildfire Resistance and Resilience - Alternative D" from A2- 19 to A2-25, including the guidance for Strategic Fire Management Zones, should be added to the Alternative B plan components as the preferred alternative, with some specific edits (noted below).

We also note the following instances where [start highlight] Alternative D recommendations are in contrast to Alternative B recommendations [end highlight] and make the following recommendations regarding our preferences between the alternatives:

1. 1. Forest Supervisor Approval: We support FORSTW-LSR-PMA-D, moving approval of LSR review/assessment to Forest Supervisor instead of the Regional Ecosystem Office, as we think it will streamline important forest management actions in LSRs. We support the REO continuing to play an advisory role regarding LSR management planning and project design/approval, but think that the Forest Supervisor should be the decision-maker. Tribes must also be consulted and coordinated with regarding LSR planning, management and project implementation.

1. 2. Survey & Manage: We support the recommendation FIRE-ALL-GDL-06-D regarding exemption from pre-disturbance surveys and survey and manage for 0.25 mile buffer in areas near communities, of tribal importance and infrastructure. "Within all LUAs, to improve efficiency in implementing actions to reduce the threat of wildfire adjacent to communities, areas of tribal importance, and infrastructure, treatments to reduce hazardous fuels within a 0.25-mile buffer of these areas are exempted from pre- disturbance surveys, and associated management requirements as described in 2001 ROD and S&Gs for Amendment to Survey and Manage for species identified in Table 1-1 (April 2014, or subsequent update). Management of known sites shall not be exempt." We support the transitioning away from Survey and Manage surveys for all land use allocations and working with Tribes to develop Species of Conservation Concern for individual forests.

2.

3. 3. NSO Suitable Habitat: We support the adoption of FORSTW-LSR-DRY-DC-01-D regarding defining suitable habitat for NSO as the historical range and the capacity of the landscape to support: "Suitable habitat for northern spotted owl is maintained at an amount reflective of a range of historic conditions within the inherent capability of the landscape given expected fire activity and other effects of climate change. Locations of northern spotted owl habitat change over time, but generally concentrate in areas more likely to persist". We encourage consultation, coordination and collaboration with Tribes in defining suitable habitat, the historical range and the capacity of the landscape to support this habitat, as well as any ensuing Critical Habitat designations and limited operating periods, for NSO and all listed and proposed Threatened and Endangered species.

4.

5.

6. 4. Treatment Acres and Timber Volumes: Regarding targets for timber volumes in dry v. moist forests, Alternative B seems to have more acres treated in dry forests and overall than Alt D, but Alt D seems to have

more acreage treated and more timber volume in moist forests (Matrix):

FORSTW-ALL-DRY-OBJ-01B v. C. v. D Re How much acreage to treat in dry forests:

- Alt B: 527,000-643,000 acres per decade

- Alt C: 104,000-127,000 acres per decade

- Alt D: 208,000-254,000 acres per decade

ECONSUST-OBJ-01B v. D, fewer acres treated overall in Alt D than Alt B:

- Alt B: 660,000-810,000 acres and 5,900-13,500 MMBF

- Alt C: 171,000-211,000 acres/decade

- Alt D: 474,000-588,000 acres/decade and 4,700-12,200 MMBF

Notes: We support reduced restrictions on doing the treatments necessary to restore forest health, the abundance of traditional foods, and resilience to wildfire and climate change.

1.

1. Fire Resilience Treatments:

-Alternative B: Treat 2.65 million acres (including all fuels treatments) per decade across all LUAs including 150,000 in CPAs and 1.75 million acres w. wildland fire (Rx, unplanned ignitions, cultural fire) that meets resource objectives per decade, reforestation on 100,000 acres in 1st decade and 115,000 acres in second decade

-Alternative D: Treat 4.95 million acres per decade across all LUAs including 900,000 acres/decade in CPAs including 2.75 million acres with wildland fire (Rx, unplanned ignition and cultural) to meet resource objectives per decades in all LUAs including LSR, reforestation on 100,000 acres in 1st decade and 125,000 in second decade.

Note: Treatment goals should be tied to achieving outcomes of communities not burning down, and forests not burning at high severity across broad acreages rather than certain numbers of acres treated. Cultural fire must be understood to be a Tribal activity under Tribal sovereign authority, not something that falls under the Forest Service's jurisdiction.

1.

1. We also advocate for including a target and standards, guidelines, and objectives regarding ongoing maintenance treatments in order to retreat areas within 3-7 years of the initial treatment and also post-high severity fire. If you're treating a certain acreage every decade and then moving to untreated acreage, the fuel load in the original treatment areas will likely have grown back.

2. We prefer Alternative D ("retain all trees established before 1850") in FORSTW-ALL- DRY-STD-01D to Alternative B ("retain all trees older than 150 yrs) in FORSTW-ALL- DRY-STD-01B and the sentence regarding exceptions: "Exceptions apply for tribal co- stewardship and cultural use, restoration of unique ecosystems, and to reduce wildfire risk to communities and infrastructure." Trees established prior to 1850 are guides, landmarks, and supports for guiding restoration of Indigenous fire regimes and management systems, so they have great

value. In a few decades, trees older than 150 years will include Douglas firs that have encroached on oak woodlands in the absence of fire, and this will be very problematic for continued restoration efforts.

3. We recommend removing the term "effective suppression" in FIRE-ALL-DC-01 "Wildland fuel conditions facilitate [start red text][start strikeout] effective suppression [end red text][end strikeout]by local resources..."

We'd suggest replacing it with: "Wildland fuel conditions facilitate [start red text] effective wildland fire management [end red text] by local resources[hellip]". We strongly believe that the USFS must signal a paradigm shift away from full wildland fire suppression policy and towards more strategic management of fire for resource benefit, social-ecological resilience and fire- adapted communities and forests.

ATTACHMENT-Letter text: Appendix B Karuk.pdf; this is the same content that is coded in text box above; it was originally included as an attachment