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MUCKLESHOOT WILDLIFE PROGRAM

USDA Forest Service

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

Portland, OR 97204

Introduction

The Muckleshoot Wildlife Program and Wildlife Committee have reviewed the Northwest Forest Plan (NWFP) Amendment Draft Environmental Impact Statement (DEIS). The comments we present below are only from the Tribe's Wildlife Committee and do not necessarily represent the views of other Tribal programs or members who may comment separately. The NWFP amendment represents a pivotal opportunity to address the ecological, cultural, and social challenges that have intensified since the Plan's inception in 1994. This process is an opportunity to correct the historical exclusion of Tribes from the original NWFP and to implement meaningful commitments to Tribal sovereignty and co-stewardship.

The federal government's trust responsibility, as enshrined in treaties such as the 1854 Treaty of Medicine Creek and the 1855 Treaty of Point Elliott, Secretarial Order 3403, U.S. Department of Agriculture Departmental Regulation (DR) 1350-002, and the U.S. Forest Service Manual (FSM 1563), obligates the U.S. Forest Service (USFS) to ensure that Tribes are full partners in managing the lands and resources that are our ancestral inheritance.

Tribal Inclusion Measures

We strongly support the inclusion of provisions that commit the Forest Service to work with Tribes to identify and secure adequate resources for co-stewardship. These provisions honor Tribal sovereignty and align with the federal government's Trust responsibilities owed to Tribes.

We feel Alternative B's approach to Tribal inclusion is strongest because it includes concrete requirements that national forests must meet within specified timeframes.

We recommend retaining all tribal inclusion plan components (Goals, Desired Conditions, Objectives, Standards, Guidelines, and potential Management Approaches) in Alternative B. In addition, we recommend adding tribal inclusion measures to Alternative B that are included in Alternative D but not in B, which include Tribal involvement in protecting rare and listed plants, post-disturbance management, and first foods management.

These plan components are:

- * TRIBAL-FORSTW-ALL-GOAL-08-D

- * TRIBAL-FORSTW-ALL-GOAL-09-D

- * TRIBAL-FORSTW-ALL-PMA-D

Forest Stewardship and Fire Resilience Measures

Moist Forest

Muckleshoot tribal members frequent the Mt. Baker-Snoqualmie National Forest and rely on it for first foods such as huckleberry, deer, elk, and many other culturally significant species. A large portion of the south zone of the Forest frequented by Tribal members has been designated LSR, with many stands < 80 years old resulting from past USFS harvest patterns and land exchanges with corporate timber companies. Many of these stands are in the stem exclusion phase of forest succession, which represent very poor habitat for deer and elk in all seasons due to a significant reduction in forage biomass (Vales et al. 2017).

We applaud the inclusion of language in all three action alternatives (FORSTW-LSR-MOI-GDL-01-B, C, and D) highlighting the importance of maintaining or restoring habitat for species like deer and elk that depend on younger stands. We support allowing treatments in stands up to 120 years old in moist LSR forests (as presented in Alternatives Band D) to ensure the perpetuation of younger stand conditions on the landscape.

We also support the tribal co-stewardship and cultural uses exception to the no harvest rule in moist forest LSR stands > 120 years old as stated in FORSTW-LSR-MOI-STD-01-B and D. Exceptions like these provide the Tribe and the Forest more flexibility in our co-managing efforts and further support the Tribal inclusion efforts mentioned above.

We recommend adding moist forest stewardship measures to Alternative B that are included in alternative D but not in B, which include:

- * FORESTW-LSR-MOI-DC-03-D

- * Recognition of the full suite of factors that influence moist forest LSRs (i.e., high intensity disturbance and tribal co-stewardship/cultural use).

- * FORSTW-MTX-MOI-OBJ-01-D

- * Increasing the treatment of young stands in moist forest matrix from 10% to 20% within 10 years.

Dry Forest

Large swathes of dry forest east of the Cascades in central Washington are open to and frequented by Muckleshoot hunters as Traditional Use Areas. The Muckleshoot Wildlife Program invests significant funds and staff time into monitoring deer populations annually in these areas.

We recommend adding dry forest stewardship and fire resilience measures to Alternative B that are included in alternative D but not in B, which include:

- * FORSTW-LRS-DRY-DC-03-D

* Maintaining suitable habitat for northern spotted owl at an amount reflective of a range of historic conditions rather than at levels identified in the 1994 NWFP, which may have been artificially high due to fire suppression (NWFP DEIS Vol 1, p. 2-9).

* FIRE-ALL-OBJ-01-D

* Increase fuels treatments from 2.65 million acres/decade to 4.95 million acres/decade across all LUAs.

* FIRE-ALL-OBJ-02-D

* Increase fuels treatment using wildland fire from 1.75 million acres/decade to 2.75 million acres/decade across all LUAs.

Other Concerns

We are concerned that the Forest Service lacks the funding and adequate staffing required to implement treatments regardless of which alternative is selected. To provide an example directly connected to the Tribe, in 2001, Management Area SE of the Mt. Baker-Snoqualmie National Forest was created under a settlement between the Tribe and the Forest Service, in part as a response to the negative impacts of LSR designations under the NWFP. The goal was to create 400-500 acres of permanent forage openings on elk winter range and 100-130 acres on summer range (USDA Forest Service 2001). In the 23 years since, less than half of these acres have been treated. We have worked closely with Forest Service staff to create and maintain the existing openings, and while we commend their effort, the limited resources they have been provided has significantly hindered their ability to complete the project in a timely manner.

Secondary to adequately staffing and funding the Forest Service at large, when facing limited resources, we suggest adding language in the EIS that directs the Forest Service to consult with staff at the Ranger District level together with local Tribes to prioritize treatment areas and shift resources accordingly.

Conclusion

Please extend a thank you to all those involved in this undertaking. Thank you for taking the time to review our comments, and for making significant strides regarding Tribal inclusion in this process.

Sincerely,

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Wildlife Program Director Muckleshoot Indian Tribe

LiteratureCited

USDA Forest Service. 2001. Record of decision and forest plan amendment 16; Huckleberry land exchange. Mt. Baker-Snoqualmie National Forest, Pacific Northwest Region. Mountlake Terrace, WA. 30 p.

Vales, D.J., Middleton, M.P., McDaniel, M., 2017. A Nutrition-Based Approach for Elk Habitat Management on Intensively Managed Forestlands. *Journal of Forestry* 115, 406-415. <https://doi.org/10.5849/jof.16-032>

ATTACHMENT-LETTER TEXT: NWFP Amendment DEIS Comment Letter_Muckleshoot Wildlife Program.pdf;
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