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Organization: Columbia River Inter-tribal Fish Commission

Title:

Comments: Comment letter in regard to the Northwest Forest Plan Amendment Draft Environmental Impact Statement by the Columbia River Inter-Tribal Fish Commission.

March 17, 2025 USDA Forest Service

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

Portland, OR 97204 Dear Mrs. Buchanan:

I am pleased to submit this comment letter regarding the Northwest Forest Plan (NWFP) Amendment Draft Environmental Impact Statement (DEIS). The United States Forest Service (USFS) NWFP Amendment is a much-needed update to the plan on climate change, fire resiliency, old growth management, and tribal inclusion issues throughout the 17 national forests. The plan area does include a portion of the Columbia Basin where salmon, steelhead, Pacific lamprey, and other resident species rear and annually migrate.

The Columbia River Inter-Tribal Fish Commission (CRITFC) was formed in 1977 by the four Columbia River treaty fishing tribes: the Confederated Tribes of the Umatilla Indian Reservation, the Confederated Tribes of the Warm Springs Reservation of Oregon, the Confederated Tribes and Bands of the Yakama Nation, and the Nez Perce Tribe. As an extension of tribal government, CRITFC acts as technical support and coordinating agency on Columbia Basin fisheries and fisheries policy for its member tribes. The ceded territories are in Washington, Oregon, and Idaho, and include the majority of the area above Bonneville Dam still accessible to Columbia Basin salmon.

The national forests identified in this amendment provide designated critical habitat to Endangered Species Act-listed salmonid species (3.5.1.2 Special Status Wildlife and Plants). The forest lands also provide many rivers and streams with vital cold water refugia during a time of climate warming. Riparian corridors, headwater water meadow systems, and spring systems are key attributes to conserve and protect fish and wildlife species. Water quality and quantity are attributes that impact all life stages of salmonids on Forest Service lands.

Although the DEIS did not directly address management of aquatic resources, there are opportunities for the Forest Service to work with federally recognized tribes utilizing tribal co-stewardship strategies to assess and restore aquatic habitat. This is especially relevant when the Forest Service works with treaty tribes and territories that are within USFS lands. The Gifford Pinchot National Forest and the Mt Hood National Forest both provide critical cold water refugia to the Wind, White Salmon, Klickitat, and Hood River watersheds which are essential for salmonids and other migratory species in the mainstem Columbia River during the very warm months of July and August.

Tribal inclusion is another important feature of this amendment, and each tribe has their unique guidelines for government-to-government consultation. Tribal members continue to utilize national Putting fish back in the rivers and protecting the watersheds where fish live forest lands for ceremonial, subsistence, and personal uses. There are many culturally significant areas and resources on the forest lands the tribes want protected. The tribes were exclusive stewards of these forest landscapes since time immemorial and tribal co-management is essential to bring traditional ecological knowledge into the current forest practices. The Tribal Inclusion section (Appendix A1) included important proposed desired conditions which would promote biodiversity, co-stewardship, and Indigenous knowledge incorporation. The tribal inclusion desired conditions would assist with protecting and enhancing important cultural and natural resources essential to Native lifeways.

Thank you for considering our perspective in this vital matter. For further comments or questions, please contact me at adecoteau@critfc.org or call (503) 238-0667.

Sincerely,

[] Executive Director

ATTACHMENT-LETTER TEXT: NWFP_DEIS031725.pdf; this is the same content that is coded in text box; it was originally included as an attachment