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<https://thepnwlf.org/>

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Pacific Northwest Region
USDA Forest Service
1220 SW 3rd Avenue Ste. G015
Portland, OR 97204

Comment submitted electronically via
<https://cara.fs2c.usda.gov/Public/CommentInput?Project=64745>

RE: Northwest Forest Plan Amendment Draft Environmental Impact Statement Comments

The [L.I.G.H.T. Foundation \(LF\)](https://thepnwlf.org/) is an independent, Indigenous-led, conservation 501(c)(3) nonprofit established on the Colville Indian Reservation in the traditional territory of the Nespelem Tribe within Washington State. We support the restoration and cultivation of native **Plant and Pollinator Relatives**¹ and the culturally respectful conservation of habitats and ecosystems which are climate resilient and adaptive. LF is interested in the ecosystem health and biodiversity of all National Forests, and in particular those within the 24.5 million acres of federally managed lands in California, Oregon, and Washington State which are subject to the Northwest Forest Plan (NWFP, Plan) Amendment Draft Environmental Impact Statement (DEIS).² These comments follow another LF has previously submitted on January 30, 2024 for the NWFP preparation of the EIS.

Indigenous Peoples (IP)³ and the ecosystems we have stewarded for time immemorial have been adversely impacted by the industrialization and privatization of resources for commodification, commercialization, and extraction. This has manifested in many forms since contact with Euro-Americans and has resulted with fractionated lands, piecemeal protections for

¹ There are countless terrestrial and aquatic native plant species, fungi, and lichens used for food, medicine, cultural, spiritual, fabric, fiber, artistic, and construction purposes which are important to Indigenous Peoples. The LF refers to these inclusively as “Plant Relatives” and recognizes that several of them rely upon the health and abundance of “Elder” trees (commonly referred to as mature and old-growth trees) and “Pollinator Relatives” like bees, birds, bats, butterflies, beetles, other insects, and small mammals. In this comment, LF also may refer to “Animal Relatives” which may include salmon, steelhead, trout, crayfish, deer, elk, moose, grouse and other aquatic and terrestrial species. Many Plant and Animal Relatives are referred to as “First Foods” by Indigenous Peoples.

² USDA Northwest Forest Plan Amendment Draft Environmental Impact Statement:
<https://cara.fs2c.usda.gov/Public/CommentInput?Project=64745>.

³ Indigenous Peoples: Native Americans, Alaska Natives, Native Hawaiians, Pacific Islanders (e.g., American Samoans, Chamorros and Carolinians of Guam and the Northern Mariana Islanders, and others), and Caribbean Islander (e.g., Taino and others) descent, and others whose ancestors have occupied what is now known as the United States and its territories since time immemorial, including citizens of Tribal Nations and non-federally recognized Tribes. See Department of the Interior (DOI) Part 301 Department Manual Chapter 7 (301 DM 7) at: <https://www.doi.gov/document-library/departamental-manual/301-dm-7-departamental-responsibilities-consideration-and>



environmental and public health, and reduced the resiliency of Indigenous socio-cultural ecologies.

The NWFP Amendment represents a pivotal opportunity to address these challenges to socio-cultural ecologies that have intensified since the Plan's inception in 1994. As original stewards of the lands and waters now managed by the U.S. Department of Agriculture (USDA), we as IP have nurtured these ecosystems for millennia, maintaining reciprocal balance and resilience with the **Spirit Relatives**⁴ that sustain our worldviews and ways of life.

This process is an opportunity to correct the historical exclusion of IP and **Tribal Nations**⁵ from the original NWFP and to implement meaningful commitments to **Tribal Sovereignty**⁶ and co-stewardship. The federal government's **trust responsibility**⁷, as enshrined in **Tribal treaties**⁸ and **reserved rights**⁹, Secretarial Order 3403¹⁰, USDA Departmental Regulation (DR) 1350-002¹¹, and the U.S. Forest Service Manual (FSM 1563)¹², obligates the U.S. Forest Service (USFS) to ensure that Tribes are full partners in managing the lands and resources that are the ancestral inheritance and responsibility of **Tribal Nations**¹³ and IP.

⁴ Spirit Relatives: Traditional foods and First Foods; sacred and spiritual plants, animals, and places; medicinal plants and animals; and fibers and materials. See: 2024 LF Annual Report at: <https://thepnwlf.org/2022-annual-report-1>.

⁵ Tribal Nation or Tribe: An Indian or Alaska Native Tribe, Band, Nation, Pueblo, Village, or community that the Secretary of the Interior acknowledges as a federally recognized Tribe pursuant to the Federally Recognized Indian Tribe List Act of 1994, 25 U.S.C. § 5130.

⁶ Tribal Sovereignty: The most basic principle of all Indian Law, that which Tribal Nations retain the right to self-government as inherent powers which have never been extinguished. See also Library of Congress, American Indian Law: A Beginner's Guide at: <https://guides.loc.gov/american-indian-law/Federal-Law>.

⁷ Trust Responsibility: The legal obligation of the federal government, including all departments and agencies, to ensure the protection of Native American Tribes and Tribal lands, assets, resources, treaty, and reserved rights. Given the fiduciary obligation, agency officials must advocate for the Tribe, act in good faith towards the Tribe, and seek to make Tribal resources under the agency's control productive and profitable (*Cherokee Nation v. Georgia*, 30 U.S. 1, 16 [1831], *Seminole Nation v. United States*, 316 U.S. 286, 296-97 [1942], *United States v. Jicarilla Apache Nation*, 131 S. Ct. 2313, 2324-25 [2011], Secretarial Order 3335).

⁸ See: American Indian Treaties: Catalog Links 1722-1868, National Archives at: <https://www.archives.gov/research/native-americans/treaties/catalog-links>. See also: Bureau of Indian Affairs: List of Indian Treaties, Department of the Interior (DOI) at: https://www.bia.gov/sites/default/files/media_document/vol_ii_appendix_i_list_of_indian_treaties_508_final.pdf

⁹ Reserved Rights: Rights not addressed by Tribal treaty provisions are presumptively reserved, so long as the rights retained are consistent with federal law and the Tribe's sovereign status, agencies should generally interpret silence in a Tribal treaty in accordance with the reserved-rights doctrine. Tribal treaties are to be interpreted as a grant of rights from the Tribes, and a reservation of those rights not granted; thus, Tribes possess proprietary and use rights and sovereign control not conveyed away by the Tribal treaty or other federal law. See: *Best Practices for Identifying and Protecting Tribal Treaty Rights, and Other Similar Rights in Federal Regulatory Actions and Federal Decision-Making* (30 November 2022) at:

https://www.bia.gov/sites/default/files/media_document/best_practices_guide.pdf.

¹⁰ DOI and USDA Joint Secretarial Order (S.O.) 3403 on Fulfilling the Trust Responsibility to Indian Tribes in the Stewardship of Federal Lands and Waters (15 November 2021) at: <https://www.doi.gov/media/document/joint-secretarial-order-3403>.

¹¹ USDA Departmental Regulation 1350-002 Tribal Consultation (30 April 2024) at: <https://www.usda.gov/directives/dr-1350-002>.

¹² USDA FSM 1500 External Relations, Chapter 1560 State, Tribal, County and Local Agencies; Public and Private Organizations; 1563 Tribal Relations WO 1500 a 2016-1) at: https://www.fs.usda.gov/cgi-bin/Directives/get_dirs/fsm?1500. See also: USDA Forest Service Handbook 1509.13 American Indian and Alaska Native Relations Handbook (9 March 2016) at: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd517668.pdf.

¹³ Tribal Nation or Tribe: An Indian or Alaska Native Tribe, Band, Nation, Pueblo, Village, or community that the Secretary of the Interior acknowledges as a federally recognized Tribe pursuant to the Federally Recognized Indian Tribe List Act of 1994, 25 U.S.C. § 5130.



We recognize the significant and collaborative efforts of the Federal Advisory Committee (FAC), whose recommendations to the USFS reflect an important step toward modernizing the NWFP. The FAC's focus on Tribal inclusion, fire resilience, Elder protection, climate adaptation, and community sustainability aligns with many LF priorities. Additionally, the Affiliated Tribes of Northwest Indians (ATNI) Resolution #24-07¹⁴ provides a unified and collective framework for Tribal advocacy in this process, emphasizing the centrality of Tribal sovereignty, treaty rights, and **Indigenous Knowledges (IK)**¹⁵ in forest management activities.

LF appreciates the steps taken to incorporate Tribal and IP input through roundtables, consultations, and the DEIS process. However, much work remains to fully address the negative impacts these colonialist and capitalistic structures embedded in Western legal frameworks have had on the traditional food systems, socio-economic structures, and cultural heritages of IP. This letter highlights the areas where the DEIS falls short and provides specific recommendations to strengthen the Plan by centering Tribal and IP leadership and advancing co-stewardship. Keeping these goals in mind, we are honored and humbled to support the advancement of the NWFP's promise to build resilience, equity, and sustainability for future generations by respectfully requesting the consideration of these comments and recommendations.

LF unequivocally supports the sovereign status of Tribal Nations and Indigenous Peoples to hunt, fish, gather, and protect Spirit Relatives within the NWFP area. These rights, enshrined in treaties, case law, and federal documents previously cited, represent legal and moral commitments that are integral to the cultural, spiritual, and economic well-being of Tribal citizens and IP. Federal trust responsibilities, including those reinforced by S.O. 3403¹⁶, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)¹⁷, demand that the United States prioritize and uphold these rights in all forest management decisions.

¹⁴ ATNI Resolution #24-07 Statement Regarding the USFS Notice of Intent (NOI) to Amend the NWFP, see: https://atnitribes.org/wp-content/uploads/2024/02/Res-24-07_Forest-Plan.pdf.

¹⁵ Indigenous Knowledges (IK)": A body of observations, oral and written knowledge, innovations, technologies, practices, and beliefs developed by Indigenous Peoples through interaction and experience with the environment. It is applied to phenomena across biological, physical, social, cultural, and spiritual systems. IK can be developed over millennia, continues to develop, and includes understanding based on evidence acquired through direct contact with the environment and long-term experiences, as well as extensive observations, lessons, and skills passed from generation to generation. IK is developed, held, and stewarded by Indigenous Peoples and is often intrinsic within Indigenous legal traditions, including customary law or traditional governance structures and decision-making processes. Other terms such as Traditional Knowledge(s), Traditional Ecological Knowledge, Genetic Resources associated with Traditional Knowledge, Traditional Cultural Expression, Tribal Ecological Knowledge, Native Science, Indigenous Applied Science, Indigenous Science, and others, are sometimes used to describe this knowledge system. See also Note 3 at 301 DM 7.

¹⁶ Ibid Note 10.

¹⁷ United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), Department of Economic and Social Affairs, see: <https://social.desa.un.org/issues/indigenous-peoples/united-nations-declaration-on-the-rights-of-indigenous-peoples>.



Section A. Importance of Consultation

Meaningful, **government-to-government (G2G) consultation**¹⁸ is not merely a procedural requirement, but a cornerstone of federal trust responsibilities and the protection of Tribal sovereignty. Executive Order 13175¹⁹, S.O. 3403²⁰, and USDA DR 1350-002²¹ stipulate that consultation must be timely, transparent, and substantive, with the intent to reach mutual understanding and agreement.

While LF acknowledges both positive and negative experiences by Tribal Nations and IP with the USFS regarding consultation, we encourage the USFS to engage Tribal Nations and IP in ways which advance positive precedence for meaningful and good faith engagement and consultation. It is expected that that NWFP amendment process shall ensure consultation is comprehensive, ongoing, and respectful by including and implementing:

1. Early notification and engagement of federal processes of decision-making for (policy, project, or regulatory planning and development);
2. Providing adequate time for Tribal review and feedback on management proposals, respecting Tribal schedules and resource constraints;
3. Maintaining regular communication throughout all phases of planning, implementation, and monitoring;
4. The incorporation of Tribal and IP input into policy, project or regulatory plans and implementation, including providing funding for collaborative activities;
5. Ensuring consultation outcomes are actionable and enforceable, with commitments formalized through agreements and protocols co-developed with Tribes and IP; and
6. Accountability in consultation by requiring written records of consultation outcomes, timelines, and actions to ensure accountability.

Section B. Key Position Points

To honor Tribal sovereignty and fulfill trust and treaty responsibilities, LF further encourages the NWFP amendment to:

1. **Formalize Enforceable Co-Stewardship Agreements**
 - a. Implement binding co-management agreements that explicitly provide Tribes with decision-making authority over culturally significant lands, species, and resources. These agreements must recognize Tribal jurisdiction, incorporate Tribal management plans, and ensure co-stewardship on all lands within the NWFP area.
 - b. Co-stewardship agreements must include specific provisions for funding, staffing, and capacity-building to support meaningful and sustained Tribal leadership in forest planning, project implementation, and monitoring efforts.
2. **Incorporate IK as Co-Equal in Forest Management**

¹⁸ Government-to-Government (G2G) Consultation: A formal component of the Tribal consultation process that engages federally-recognized Tribal leaders and incorporates their input into decisions. A formal G2G meeting, between Tribal leaders and similarly high-level federal or state decision makers, is customarily part of this process, and may include multiple meetings, discussions, and the reciprocal sharing of information. More than one formal G2G meeting among decision makers may be required in a G2G consultation. See: West Coast Ocean Tribal Caucus (WCOTC) for more information:

https://www.oregon.gov/lcd/Commission/Documents/2022-03_Item-4_TSPPart3_Attachment-B_West-Coast-Tribal-Engagement-Guidance-March-2020.pdf

¹⁹ Executive Order (EO) 13175 Consultation and Coordination with Indian Tribal Governments (6 November 2000): <https://www.federalregister.gov/documents/2000/11/09/00-29003/consultation-and-coordination-with-indian-tribal-governments>

²⁰ Ibid Note 10.

²¹ Ibid Note 11.



- a. IK systems, which have successfully sustained ecosystems for millennia, must be integrated as a foundational element of forest management. The NWFP amendment must ensure IK is applied at all stages of decision-making, including project design, implementation, and adaptive management.
 - b. IK must be treated with the same respect and authority as Western scientific methods, ensuring that it informs standards, objectives, and guidelines for culturally and ecologically significant areas.
- 3. **Protect Tribal Data Sovereignty and Cultural Information**
 - a. Ensure that all Tribal knowledge, IK, data, and cultural information are protected by robust Tribal data sovereignty protocols, requiring **free, prior, and informed consent (FPIC)**²² before use.
 - b. Confidentiality provisions must safeguard sensitive Tribal information and ensure that its use aligns with the principles of Tribal sovereignty and self-determination.
- 4. **Restore and Protect Spirit Relatives and Practices Associated with Religious Freedoms**²³
 - a. The NWFP amendment must prioritize the restoration and protection of Spirit Relatives such as grizzly bear, wolf, salmon, lamprey, huckleberries, serviceberry, and camas, which are critical to Tribal ceremonies, diets, and ecological stewardship. Specific enforceable objectives must ensure the health, quality, and abundance of these species.
 - b. Provide Tribes unfettered access to sacred sites, traditional cultural properties, and gathering areas, with management practices explicitly designed to avoid harm to these spaces.
- 5. **Address Historical Injustices and Structural Barriers**
 - a. The original NWFP (1994) excluded meaningful Tribal Nation and IP participation, resulting in significant harm to Tribal and IP rights, ecosystems, and cultural resources. The amended NWFP must explicitly acknowledge these historical injustices and implement restorative measures to rebuild trust and capacity for equitable co-management.
 - b. Structural barriers to Tribal participation in forest management must be identified and dismantled, including regulatory constraints and funding inequities that hinder Tribal-led initiatives.

Section C. Tribal Inclusion in the NWFP DEIS

LF acknowledges and appreciates that the DEIS highlights "Incorporation of Indigenous Knowledge and Increased Tribal Inclusion" as a priority issue and dedicates a section to it (Chapter 3, p. 3-1 to 3-14). We also recognize that the Proposed Action/Alternative B, as well as the other action alternatives, include a robust suite of Tribal Inclusion plan components—Desired Conditions, Goals, Objectives, Standards, Guidelines, and Potential Management Approaches (Appendix A1). Collectively, these components represent critical

²² Free, Prior, and Informed Consent (FPIC): Article 19 of UNDRIP uses the term "Free, Prior, and Informed Consent" (FPIC), although it is defined therein. The Food and Agriculture Organization of the United Nations defines FPIC as "a specific right that pertains to Indigenous Peoples and is recognized in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). It allows Indigenous Peoples to give or withhold consent to a project that may affect them or their territories."

²³ See American Indian Religious Freedom Act (AIRFA) at: <https://www.govinfo.gov/content/pkg/COMPS-5293/pdf/COMPS-5293.pdf>



steps toward fostering meaningful government-to-government collaboration and ensuring that Tribal interests, rights, and knowledge are embedded in forest management practices.

However, we are deeply concerned that the effects analysis in the DEIS focuses almost entirely on the proposed Objectives and provides insufficient discussion of the other Tribal Inclusion plan components. These additional components collectively form the necessary framework for advancing Tribal access and gathering, preserving biodiversity, facilitating co-stewardship, incorporating IK, honoring Tribal treaty and reserved rights, fostering workforce development, and improving interagency coordination. While we acknowledge references to Tribal Inclusion plan components in other sections of the DEIS, the Tribal Inclusion section itself (Chapter 3) must be expanded to fully analyze the collective impacts and benefits of all proposed components. Furthermore, the DEIS should explicitly highlight the major differences between the No Action Alternative and Alternative B regarding Tribal Inclusion, as this comparison is essential for understanding how the Proposed Action would advance the federal Trust responsibility and support Tribal sovereignty.

We understand that while the NWFP Amendment will establish Standards, Guidelines, and other management parameters, it cannot commit the USFS to specific allocations of funding or staffing. However, we also recognize that the Amendment can prioritize efforts and establish Objectives to support Tribes in identifying and securing resources. This approach is vital to enable Tribes to participate fully in co-stewardship initiatives and strengthen their capacity for interdisciplinary collaboration.

We urge the USFS to revise and expand the Tribal Inclusion section of the DEIS to provide a more comprehensive analysis that reflects the breadth and importance of the proposed 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.

1. Environmental Impacts

- a. **Ecological Concerns:** The DEIS insufficiently addresses the potential ecological impacts on Tribal lands and resources as well as National Forest System lands. For example, increased wildfire severity and changes in water quality can degrade habitats critical for Spirit Relatives specifically noted in this letter.

Specific concerns include:

- i. **Water Quality:** Riparian areas essential to traditional fisheries and water sources face threats from sedimentation and improper management activities. The DEIS should include enforceable measures to restore and protect these areas under Tribal co-management.
 - ii. **Wildlife Habitat:** Habitat loss of Plant, Pollinator, and Elder Relatives, and keystone species such as salmon and lamprey is inadequately addressed. The NWFP must prioritize Tribal-led initiatives to monitor and restore these populations with specific habitat recovery targets.
 - iii. **Native Plant & Pollinator Relatives:** The DEIS does not allocate sufficient attention to the restoration and sustainability of culturally significant native Plant and Elder Relatives. Tribal cultural burning practices and the conservation of Pollinator Relatives and other Spiritual Relatives must be included as a core strategy to ensure the health of these species.
- b. **Climate Change Considerations:** While the DEIS references climate resilience, its measures are insufficient to address the scale of the crisis. Tribes have long observed the impacts of climate change on ecosystems, including shifts in traditional species distributions and increased wildfire risk. Recommendations include:



- i. **Stronger Climate Actions:** Incorporate Tribal climate assessments and adaptation plans into the NWFP. These plans should inform forest management strategies and resilience measures. Significant Tribal and Indigenous-led resources exist, i.e., LF's Pacific Northwest Tribal Climate Change Project²⁴ and the Tribal Resilience Action Database.²⁵
- ii. **Specific Metrics:** Establish clear, measurable objectives for reducing greenhouse gas emissions through carbon sequestration projects and climate-informed forest restoration.
- iii. **Cultural Fire Practices:** Expand the use of cultural burns as a critical climate adaptation and mitigation tool.

2. Cultural and Archaeological Resources

- a. **Protection of Sacred Sites:** Sacred sites, cultural landscapes, and archaeological resources within the NWFP area are vital to our culture, traditional ways of life, identity, and history. However, the DEIS lacks enforceable protections for these areas. Specific recommendations include:
 - i. Develop and implement protocols requiring formal Tribal consultation before any management activities that may impact sacred sites or Traditional Cultural Properties.
 - ii. Mandate avoidance of disturbance in identified sacred areas, supported by enforceable standards for their long-term protection.
- b. **Indigenous Knowledge (IK):** IK is indispensable for informed and sustainable forest management, yet the DEIS fails to provide clear mechanisms for its integration. Examples of IK applications include appropriately and in a culturally respectful manner:
 - i. **Wildlife Management:** Applying IK to inform salmon and lamprey restoration projects by aligning strategies with seasonal and ecological knowledge held by Tribal practitioners.
 - ii. **Forest Health:** Incorporating IK into to design restoration practices, such as thinning and prescribed burns, that emulate natural processes and ensure ecosystem resilience.
 - iii. **Intangible Cultural Heritage (ICH)**²⁶: Applying IK to maintain the health and availability of Spirit Relatives, fostering ecological stewardship and cultural preservation of oral traditions and expressions, performing arts, social practices, rituals and ceremonies, and traditional craftsmanship.²⁷

3. Economic Impact

- a. **Sustainable Economic Opportunities:**

Tribal communities must benefit from sustainable economic initiatives that align with our values. The DEIS inadequately explores these opportunities. Specific suggestions include:

 - i. Expand Tribal and IP participation in restoration contracts and co-stewardship agreements to support economic self-determination.

²⁴ LF Pacific Northwest Tribal CLimate Change Project: <https://tribalclimate.uoregon.edu/>.

²⁵ Tribal Resilience Action Database: <https://tribalresilienceactions.org/>.

²⁶ Intangible Cultural Heritage (ICH): The practices, representations, expressions, knowledge, skills (as well as the instruments, objectives, artifacts, and cultural spaces associated therewith) that communities, groups, and in some cases, individuals recognize as part of their cultural heritage. It is transmitted from generation to generation, constantly evolved by communities and groups in response to their environment, interactions with nature and unique histories, and provides identity and continuity. See: United Nations Educational, Scientific, and Cultural Organization (UNESCO) Intangible Cultural Heritage at: <https://ich.unesco.org/en/home>.

²⁷ Ryser, R. Marchand, A., Parker, D. (2020). *Cultural Genocide: Destroying Fourth World People*. In Fourth World Journal. Summer V20, N1. Pp 82-83. Available at: <https://www.cwis.org/fwj/volume-20-number-1/>.



- ii. Prioritize Tribal- and Indigenous-led enterprises in initiatives such as riparian restoration, cultural burning, and habitat monitoring, ensuring economic opportunities align with ICH.
 - b. **Job Creation and Economic Development:**

Job creation is essential for building capacity within Tribal communities while addressing forest management needs. Recommendations include:

 - i. Provide funding for workforce development programs, including the Indian Youth Service Corps, to train Tribal citizens in ecological restoration and monitoring and fire management.
 - ii. Support Tribal-specific infrastructure priorities and projects, such as nurseries and facilities for Plant, Pollinator, and Animal Relatives.
- 4. Health and Well-being**
- a. **Community Health Implications:**

The DEIS does not adequately address the disproportionate health impacts of wildfire smoke, water quality degradation, and loss of Indigenous food systems on Tribal communities. Specific concerns include:

 - i. Wildfire smoke poses a severe threat to respiratory health in Tribal communities located near forest management areas. The DEIS must prioritize air quality monitoring and mitigation funding for these areas.
 - ii. Water resource degradation threatens the health of Tribal fisheries and drinking water supplies. Specific Tribal-led monitoring and restoration programs must be funded to address these issues.
 - b. **Public Health Recommendations:**

The protection, conservation, and equitable sharing of Plant and Animal Relatives is not only an exercise of cultural responsibility, but a significant action to address food insecurity across Indian Country. For Tribes and IP, being on natural landscapes and partaking in activities like hunting, fishing and harvesting are not recreational.²⁸ They are millenia-old cultural expressions of food system justice and security. The ability to access traditional foods and medicines feeds families with nutritious meals while building community resilience and nourishing ICH through practice and intergenerational knowledge exchange. To protect Tribal health, the DEIS must incorporate the following measures:

 - i. Allocate funding for air quality monitoring and mitigation strategies, including clean air shelters and filtration systems in Tribal communities.
 - ii. Include mandatory standards for riparian restoration to improve water quality for fisheries and drinking water sources.
 - iii. Enhance access to traditional foods by funding programs to restore habitats for Plant, Pollinator, and Animal Relatives and ensuring their accessibility to Tribal citizens.
 - iv. Prohibit the use of chemical applications and the spraying of pesticides, fungicide, insecticides and other harmful chemicals which may Plant, Pollinator, and Animal Relatives.

Section D. Recommendations

²⁸ Littman, N (2024). "Bitterroot. Salmon. Huckleberry. Fly." *Methow Valley Citizens Council Valley Voice, Fall/Winter 2024* (pp. 5-8). See also: Hamilton, M (2024). "The Revitalization of Inchelium Red: A Step Towards Food Sovereignty." *Methow Valley Citizens Council Valley Voice, Fall/Winter 2024*. (pp. 9). Both located at: https://thepnwlf.org/Fall-2024_Final_updated.pdf



To address the shortcomings in the DEIS and ensure the NWFP amendment aligns with Tribal priorities and responsibilities, the following recommendations are provided:

1. **Formalize Enforceable Co-Stewardship Agreements:**
 - a. Establish binding co-stewardship agreements with Tribes that include decision-making authority, measurable outcomes, and guaranteed funding. These agreements must provide Tribes with management authority over culturally significant lands and resources, as outlined in Secretarial Order 3403.
 - b. Develop co-stewardship agreements within two years for all lands of cultural significance to Tribes within the NWFP area, incorporating Tribal management standards and guidelines.
2. **Protect Sacred Sites and Cultural Landscapes:**
 - a. Mandate consultation with Tribes, Tribal Historic Preservation Officers (THPOs) and IP to inform and advise on applicable cultural resource laws and protection mechanisms prior to any undertaking or management activity, especially near sacred sites, Traditional Cultural Properties, and burial grounds.
 - b. Through consultation with Tribes and IP, develop enforceable standards to prevent disturbance in identified sacred areas, supported by funding for long-term site protection and monitoring programs.
3. **Integrate Indigenous Knowledge (IK) into Forest Management:**
 - a. Require Indigenous Knowledge to be included at all stages of management, from planning to implementation and monitoring.
 - b. Establish a formal IK consultation process, co-developed with Tribes and IP, ensuring IK is applied with respect, consent, and data sovereignty.
4. **Address Climate Change with Tribal- and Indigenous-Led Strategies:**
 - a. Incorporate Tribal climate vulnerability assessments and adaptation plans into the NWFP amendment to guide forest management and resilience measures.
 - b. Establish specific metrics to track and reduce greenhouse gas emissions through forest carbon sequestration projects, prioritizing restoration of mature and old-growth forests.
 - c. Expand cultural fire practices with measurable targets (e.g., acres treated annually through Tribal-led cultural burns) to reduce wildfire risk and enhance ecosystem resilience.
5. **Restore and Protect Culturally Significant Species and Habitats:**
 - a. Expand the Survey and Manage program to include culturally significant species, such as salmon, lamprey, huckleberries, and camas, with specific objectives for habitat restoration and species population recovery.
 - b. Fund Tribal-led restoration projects with clear annual targets, such as the restoration of 5,000 acres of riparian and upland habitats critical to culturally significant species.
6. **Foster Sustainable Economic Opportunities for Tribes:**
 - a. Allocate at least 30% of all restoration and stewardship contracts under the NWFP to Tribal and Indigenous entities, prioritizing culturally and ecologically aligned projects.
 - b. Expand funding for programs like the Indian Youth Service Corps and Good Neighbor Authority to support Tribal workforce development and create long-term employment opportunities.
7. **Support Tribal Workforce Development:**
 - a. Establish dedicated funding streams for Tribal training programs in restoration, fire management, ecological monitoring, and climate adaptation.



- b. Create internships and apprenticeships within the Forest Service for Tribal members, ensuring Tribal representation in management decision-making roles.
- 8. **Protect Tribal Community Health and Well-Being:**
 - a. Fund air quality monitoring and clean air shelter programs to mitigate the impacts of wildfire smoke on Tribal communities.
 - b. Establish mandatory water quality standards to protect Tribal fisheries and drinking water sources, with funding for Tribal-led monitoring and restoration.
 - c. Support programs that enhance access to First Foods, including funding for habitat restoration and removal of access barriers for Tribal gatherers.
- 9. **Advance Adaptive Management and Flexibility:**
 - a. Enable Tribes to implement their own land management standards and guidelines, with provisions allowing these standards to supersede NWFP components where necessary to fulfill treaty rights and cultural obligations.
 - b. Allow Tribal-led adaptive management practices, including experimental projects such as culturally guided thinning, beaver reintroduction, and ecological engineering of riparian systems.
- 10. **Establish Accountability Mechanisms:**
 - a. Require annual public reporting on co-stewardship progress, including specific metrics for Tribal participation, ecological restoration, and climate adaptation outcomes.
 - b. Create a Tribal oversight body to monitor and evaluate NWFP implementation, ensuring accountability to trust and treaty obligations.
 - c. Incorporate enforceable deadlines for meeting objectives related to co-stewardship agreements, cultural burning targets, species recovery, and climate action.

In addition to the recommendations outlined above, we urge the USFS to include specific plan components that commit to working in partnership with Tribal Nations and Indigenous Peoples to identify and secure funding sources. This should include strategies for supporting Tribal and Indigenous capacity-building efforts to participate in interdisciplinary planning and implementation processes, ensuring meaningful co-stewardship opportunities.

Thank you for this opportunity to provide comments to the Northwest Forest Plan Amendment Draft Environmental Impact Statement. Implementing actions such as those outlined here have been shown to effectively improve biodiversity, which in turn creates health and food security, helps fight disease, grows economies and business opportunities, provides livelihoods, and protects humanity's existence. The L.I.G.H.T. Foundation appreciates your consideration and is committed to working with all government entities, partners, and allies to ensure that the Plant, Pollinator, and Animal Relatives associated with IP's traditional homelands remain resilient and strong for the next Seven Generations.

Limlmt, qeciyyew'yew', thank you,



Amelia AM Marchand, MELP

Executive Director

[L.I.G.H.T. Foundation](https://thepnwlf.org/)

