

## Introduction

This document is a summary of Tribal Government comment on the National Forest System Land Management Planning Notice of Intent to Prepare an Environmental Impact Statement for the Planning Rule (NOI). The formal comment period began on December 18, 2009, and ended February 16, 2010. There were 13 responses received from tribal governments, elected officials or agencies and organizations representing a tribal perspective.

While this summary does not seek to capture every specific concern, it strives to identify key issues and themes for decisionmakers and the public. This process and the resulting analysis do not replace comments in their original form. Members of the planning rule team have read the actual letters firsthand. (See Table 1, pg. 2 to access actual letters).

## Summary of Issues

A commonly stated comment is reflective of many of the more specific concerns raised by commenting Tribes:

*"Tribal people have performed ecosystem management on these lands from time immemorial. Tribes and federal agencies must do a better a better job in coordinating our efforts to insure that we utilize existing laws, regulations and policies to provide the maximum benefit to Indian beneficiaries. Federal land managers would benefit greatly from the involvement of Indian people in the management of resources which are so important to us. President Obama, in his memorandum on Tribal consultation, acknowledged that "History has shown that failure to include the voices of tribal officials in formulation policy affecting their communities has all too often led to undesirable ad, at times, devastating and tragic results"."*

Foremost on tribal governments' minds is that the Forest Service meet treaty and trust responsibilities including the requirement for government to government consultation with federally recognized tribes. While some respondents were concerned that there was no evidence of a national consultation strategy for the Planning Rule, most requested that the Forest Service recognize the regional approaches to consultation that have been worked out between the Forest Service regions and the affected tribes. These respondents feel that regional approaches have been developed in conjunction with the tribes and best meet the differing needs of tribes across regions.

In addition to consultation, many highlight the need, and benefits, to early collaboration, coordination and partnerships with the tribes during the planning process. They note the benefits of combining traditional knowledge with current science and request that the Forest Service find ways to involve Indian people in the planning process. One respondent stated that *"[I] tribal participation improves forest management. Tribes have relevant traditional knowledge, time tested management practices and culturally appropriate approaches needed for sustainable forest stewardship."* Some state that providing funding will allow for greater participation by tribes.

Most respondents support an all lands approach to planning and note the benefits of coordinating with existing Indian Land Use Plans.

The contribution of National Forest System lands to local economies is most often discussed in a more holistic way, recognizing the interdependency of social/cultural, economic and ecological systems as in this comment: *“Instead of economics being the driving factor for the level of social and ecological benefits achieved, social needs that support ecological benefits could contribute economic byproducts to support sustainable management principles nationally.”*

Respondents have mixed views on access to National Forest System lands with some preferring limiting access to culturally or ecologically sensitive areas and others requesting increased access (roads) to all lands.

The importance of adaptive management, monitoring and mitigation are mentioned frequently as in this comment: *“Plans could proactively address climate change through monitoring, mitigation and adaptation, and could allow flexibility to adapt to changing conditions and incorporate new information.”*

Finally many emphasize compliance with statutory requirements including, but not limited to, the Federal Land Policy and Management Act, the Tribal Forest Protection Act and the Alaska National Interest Lands Conservation Act.

All comment letters received on the Notice of Intent are posted for viewing at:

<http://contentanalysisgroup.com/fsr/>

Letters are indexed by letter number. Tribal and related organizational responses used for this summary are identified below.

**Table 1: Tribal Government and Related Responses to Notice of Intent**

| Letter Number | Signatory             |  |
|---------------|-----------------------|--|
| 80            | PETE RAMIREZ          | CA VLY MIWOK TRB                       |
| 107           | KEVIN DAY             | TUOLUMNE BND OF ME-WUK INDNS           |
| 143           | SAMUEL N PENNEY       | NEZ PERCE TRB                          |
| 144           | ARCH SUPER            | KARUK TRB                              |
| 148           | DR VIRGIL AKINS       | US DOI BUR OF INDN AFFRS NTHRN CA AGCY |
| 153           | VELMA WHITEBEAR       | CA VLY MIWOK TRB                       |
| 154           | DALE RISLING          | US DOI BUR OF INDN AFFRS PAC REGL OFC  |
| 171           | JENNIFER JOHNSON      | WASHOE TRB OF NV & CA                  |
| 244           | DAVID PHILLIPS        | CHUGACH AK CORP                        |
| 333           | DEE DOMINGUEZ         | KITANEMUK & YOWLUMNE TEJON INDNS       |
| 333           | STEVEN HABERFELD PH D | INDN DISPUTE RESOLUTION SVCS           |
| 333           | DICK GOOBY            | INDN NATIONS CONSERVE ALLNCE           |
| 384           | GLENDA NELSON         | ENTRPRS RNCHRIA                        |
| 673           | LEONA L WILLIAMS      | PINOLEVILLE POMO NAT                   |
| 674           | BILLIE G SAULQUE      | UTU UTU GWAITU PAIUTE TRB              |
| 675           | KYLE SELF             | GREENVILLE RNCHRIA                     |

