

# Assessment of Indian Forests and Forest Management in the United States

## Executive Summary

The Fourth Indian Forest Management Assessment Team  
for The Intertribal Timber Council

2023



# Acknowledgements

The IFMAT IV core team would like to thank the tribes who participated in this assessment as well as the Intertribal Timber Council oversight committee for providing comments on the draft report. The core team

also appreciates the assistance of numerous individuals that were interviewed, including the BIA Central Office and Regional staff, as well as tribal community members and tribal leaders who participated

in focus groups and surveys. This report could not have been possible without the technical specialists, student participants, and editors. Funding was provided by BIA and USDA Forest Service.

## Core Team

John Gordon, PhD, Co-chair  
John Sessions, PhD, Co-chair  
Serra Hoagland, PhD, Co-chair  
Adrian Leighton, PhD, Co-chair  
Vincent Corrao, BS,  
Program Manager

## Technical Specialists

Michael Dockry, PhD  
John Bailey, PhD  
Mark Rasmussen, MS  
George E. Smith, MPA  
David Cleaves, PhD  
Mark Corrao, PhD  
Tim Vredenburg, BS  
Dave Wilson, BS  
Marla Emery, PhD  
Dave Mausel, PhD  
Greg Dillion, MA  
Lloyd Irland, PhD

## Student Participants (Tribe in parenthesis)

Anthony Ciocco (Muscogee)  
Chase Christopherson  
(Sioux/Mandan)  
Austin Durglo (Confederated Salish  
and Kootenai Tribes)  
Tyler Everett (Mi'kmaq Nation)  
Hannah Funke (1st Descendant  
Confederated Salish and  
Kootenai Tribes)

## The 41 Participating Tribes

Bristol Bay Native Association,  
Alaska  
Chugachmiut, Alaska  
Confederated Salish and  
Kootenai Tribes  
Confederated Tribes and  
Bands of the Yakama Nation  
Confederated Tribes of  
Grand Ronde  
Confederated Tribes of the  
Colville Reservation  
Confederated Tribes of the Coos,  
Lower Umpqua and Siuslaw Indians  
Coquille Indian Tribe  
Cow Creek Band of  
Umpqua Tribe of Indians  
Eastern Band of Cherokee  
Gana-A 'Yoo, Limited, Alaska  
Grand Portage Band of  
Lake Superior Chippewa  
Hoopa Valley Tribe  
Houlton Band of Maliseet Indians  
Kalispel Tribe of Indians  
Karuk Tribe  
Leech Lake Band of Ojibwe  
Makah Indian Reservation  
Menominee Tribe  
Mescalero Apache Tribe  
Metlakatla Indian Community,  
Alaska  
Mi'kmaq Nation  
Mississippi Band of  
Choctaw Indians  
Navajo Nation  
Nez Perce Tribe  
Passamaquoddy Tribe  
Penobscot Nation  
Pueblo of Acoma  
Pueblo of Santa Clara  
Quinalt Indian Nation  
Red Lake Nation  
San Carlos Apache Tribe  
Spokane Tribe of Indians  
Stockbridge-Munsee Band  
of Mohican Indians  
Tanana Chiefs Conference, Alaska  
Tulalip Tribes  
Tule River Tribe  
Yurok Tribe  
Warm Springs Tribe  
White Earth Nation  
White Mountain Apache Tribe





*Woodland restoration project at San Carlos Apache.* PHOTO CREDIT: SERRA HOAGLAND

## Introduction

The Intertribal Timber Council (ITC), for the fourth time, has organized a team to conduct this federally mandated assessment of forestry on American Indian lands. The statute mandating the Indian Forest Management Assessment is the National Indian Forest Resources Management Act (NIFRMA), enacted as Title III of Public Law 101-630 on November 28, 1990. The Secretary of the Interior is required under NIFRMA to undertake an independent national assessment of Indian Forests and Forest Management every ten years. This

assessment is contracted to the ITC which in turn has engaged a team of nationally known experts in forest management to do the assessment and prepare the report for Congress. As with previous assessments, the 4th Indian Forest Management Assessment Team (IFMAT) is required to address eight tasks defined in NIFRMA and three additional tasks specified by ITC.

In the 2019 base year there were 19.3 million acres of tribal trust forested lands in the United States (F&PA 2019), which includes

approximately 10.2 million acres of commercial forests and woodlands. These lands provide important economic, social, and cultural resources to Indian communities. The federal government has a fiduciary duty to ensure that the lands are managed in the best interest for Indian people.

Past IFMAT reports and current findings show that tribal forestry can serve as a positive example of promoting environmental stewardship, but numerous urgent challenges exist in sustaining tribal forests for the benefit of



*Helicopter drafting water during an active wildfire on the Spokane Tribe of Indians Reservation.*

PHOTO CREDIT: VINCENT CORRAO

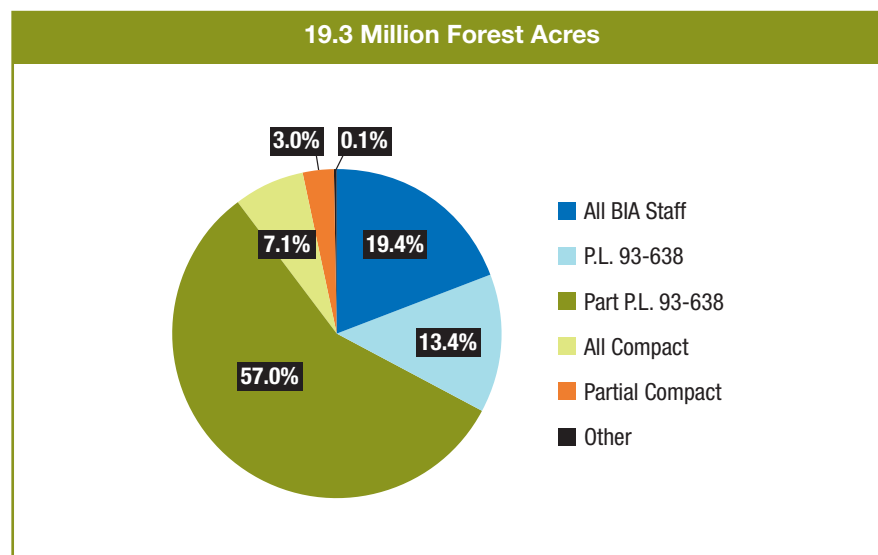
Indian people. Most notably, tribal forestry departments are underfunded and understaffed compared to their neighbors and high stand density conflated with limited processing infrastructure has created complex forest health conditions. However, increases in co-management authorities, tribal self-determination, and the creation of new programs that support tribal workforce development may begin to alleviate these challenges.

This executive summary is intended to provide a condensed overview of the main IFMAT IV report findings and recommendations. Additional details with further analysis can be found in the various task sections of the main report.

Where applicable, specific task findings and recommendations are listed in parenthesis (i.e., A2 for Task A finding or recommendation #2). Additional sections with

findings and recommendations might also be referenced (i.e., V for Vision, NTFP for Non-Timber Forest Products, etc.).

**Figure ES.1.** Forestry Self-governance program by number of trust acres. (Source: 2019 F&PA report).



# Methods

Over a period of two years IFMAT addressed the eight congressionally mandated tasks and the three additional tasks provided by the ITC by 1) visiting 37 tribal forests and hosting 41 virtual calls with tribal forestry departments of varying sizes and governance structures; 2) surveying tribal

communities and the BIA staff about tribal forestry and staffing issues; 3) conducting focus groups during visits to obtain the perspectives of tribal communities; 4) comparing forest management on tribal lands to similar federal and private lands; and 5) hosting virtual and in-person visits with

BIA agency offices, regional and central office. Eight major findings arose from these efforts that are listed below with supplemental information for each. From the eight major findings IFMAT proposes a suite of major and supporting recommendations.

## Major Findings

### **1. There is a unique tribal vision of forest management including a focus on stewardship and non-timber forest products (NTFP) as self-governance (SG) increases yet the Secretary's trust responsibility remains and is vaguely defined.**

- As in previous assessments, forest-based income continues for many tribes to be a less-important value. (V1). Many tribes are prioritizing stewardship and traditional uses of their forests over timber production (A1). Tribes continue to question Allowable Annual Cut (AAC) achievement as a success measure, as used by BIA in the past (E7). The aggregated AAC for tribal forests has increased slightly overtime but timber harvests have generally not been achieved, with 2019 being the lowest since the Depression era, and management of tribal forests has shifted from a focus on timber production toward forest stewardship (H1).
- There is a wide range of NTFP and benefits that come from

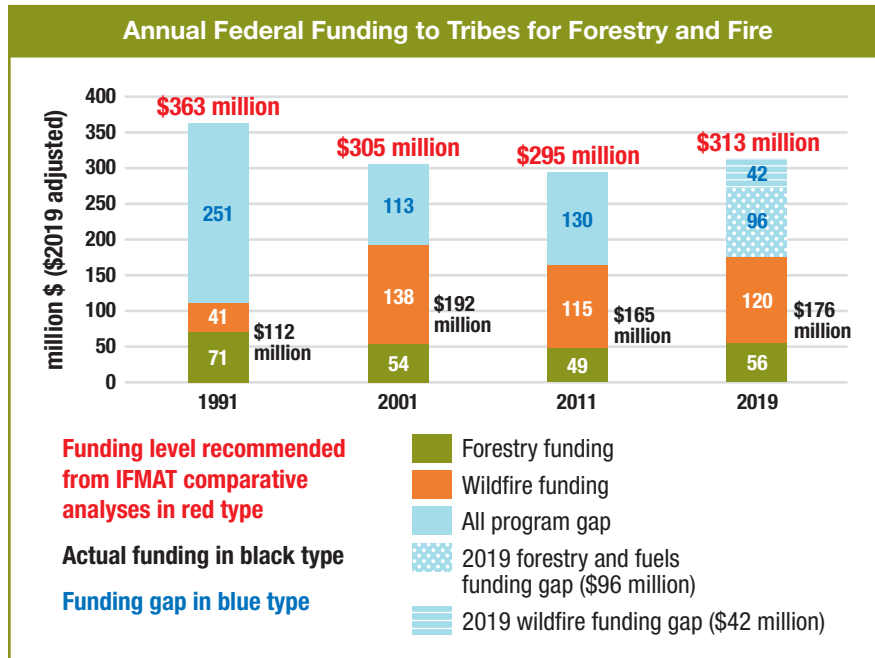
tribal forests that sustain tribal lifeways and traditions. Most commonly identified NTFP include herbaceous plants, fish and wildlife species, roots, moss, firewood, gravel and minerals, fungi and tree components (bark, sap, leaves/needles, seeds/nuts) that are harvested by the community for food and medicinal purposes, to maintain cultural traditions, ceremony, and connections to the land (NTFP1).

- Numerous threats exist to NTFP. These include reduced access, decline in NTFP populations, increased human pressure, changes in forest structure, as well as loss of native language resulting in loss of traditions around gathering, preparing, and processing NTFP (NTFP4).
- Approximately 80% of tribal trust forested acres (includes all categories) are managed wholly or partially under P.L. 93-638 contracts, cooperative agreements, or SG compacts rather than direct service. This is 38% of all tribal forestry and fire programs. The continued advancement of tribes to SG and

new opportunities provided by the Indian Trust Asset Reform Act (ITARA) makes the current BIA manual and handbook approach to development and compliance with federal standards less relevant (G6, Appendix xi). Also, inconsistent requirements and guidance exist between BIA direct operations and SG tribes relating to trust oversight, trust standards and trust responsibility (G7).

- A significant shift in concept and performance of inherent federal function for SG/ITARA tribes leaves unaddressed issues relating to Secretary's trust responsibility: As tribes continue to move towards SG and perform programs under ITARA, the context of the inherent federal function and the relationship of the performance of this function in fulfilling the Secretary's trust responsibility changes. This leaves a residual trust responsibility that is not well understood and can lead to underutilization of SG authorities (G18). In theory the intent of SG can improve the ability for tribes to accomplish their vision (Table SG.1).

**Figure ES.2.** Annual federal budgeted funding level to tribes for forestry and fire adjusted to \$2019. IFMAT IV recommended funding level of \$313 million is based on a comparative analysis to the U.S. Forest Service and other federal programs. This amount does not include estimated federal contributions of \$11 million from other BIA programs or other federal sources such as NRCS. It also does not include needed funding to address the road maintenance backlog which was \$200 million in 1991 and has increased to \$1.33 billion in 2019. Subtotals may not add to total due to rounding.



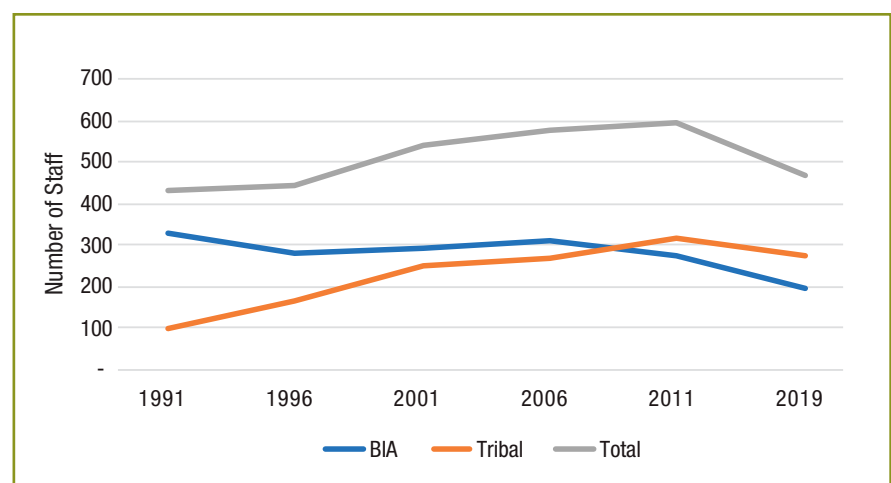
**2. Funding to support tribal forest management is limited.**

- Funding for BIA forestry and wildfire preparedness continue to be far below investments in National Forest and BLM funding for comparable lands (A2). The Tribal Forestry Program funding requirements set forth in NIFRMA Section 3310 are not being met, more than 50% were being funded at levels below those prescribed in 25CFR163.36.
- The gap between federal funding for tribal forests and other lands held in trust by the federal government decreased sharply between 1991 and 2001 (Figure ES.2) due to a significant reduction in Forest Service funding coupled with a large increase in tribal wildfire

funding (including fuels reduction). However, since 2001 the gap has been increasing due to a combination of rising federal investments in the Forest Service for forestry and wildfire and reduced or stagnant tribal funding.

- There is an imbalance between recurring funding and nonrecurring funding as well as no adjustments for inflation (A5). Funding has trended to favor nonrecurring project funding rather than recurring funding that supports stable tribal capacity to carry out long term forest management and, the project funding model may undermine self-governance. Costs of management increase over time, but recurring funding has not kept up with inflation (C2/H11).
- Due to congressional continuing resolutions regarding the federal budget and agency delays, appropriated funding is arriving too late in the year to efficiently implement forestry practices increasing costs, reducing effectiveness, and jeopardizing both regeneration success and forest sustainability (A6).
- The need for Burned Area Emergency Response (BAER) funds has increased significantly due to more frequent and larger wildfires on Indian lands. However, BAER funding is often insufficient to meet emergency

**Figure ES.3.** Professional staffing levels for tribes and the BIA for fire and forestry staff.





*A wildfire salvage timber sale operated by the Confederated Salish and Kootenai Tribes in Montana.*  
PHOTO CREDIT: VINCENT CORRAO

needs and the policies and procedures for administering these funds are not aligned with the timing needs for project implementation. The BIA only has two BAER staff officers (H6).

### **3. Limited staffing and issues around workforce capacity are impacting tribal forest management.**

- Forestry Tribal Priority Allocation (TPA) funding has remained relatively static, compared to budget increases that are used to fund annual, mostly competitive projects. The result of this is that neither the BIA nor tribes have adequate funds to pay for staffing (C1). This problem is especially acute for tribes that compacted or contracted programs several

decades ago. In multiple visits the team was told that the annual funding from the Bureau has not increased in 20 or more years and is no longer a sufficient amount to pay salaries it was originally designed to.

- It is increasingly difficult for tribes to bring on permanent staff due to uncertainty in funding levels (C2). In many cases, the team heard that future increases in project funds were irrelevant because there was a shortage of staff to perform the work and in many cases the facilities to house them.
- Indian and tribal preference hiring policies have led to an increase in Native foresters working for tribes and the BIA, but can have unintended

consequences (C4) such as the positions not being filled when they cannot identify a qualified tribal applicant or the forestry positions being filled with tribal members who have experience in other natural resource disciplines (i.e. wildlife, range, hydrology, etc.) which makes it more challenging for them to pursue the National Advanced Silviculture Program (NASP) certifications.

- The lack of qualified personnel for timber sale layout makes it difficult for tribes to complete timber sales for meeting annual harvest volumes (D1).
- BIA training tends to be technical and compliance oriented and tribes are not receiving access to the



*The mouth of the Klamath River, critical salmon habitat for the Yurok and Karuk Tribes in California.*

PHOTO CREDIT: VINCENT CORRAO

broad scope of trainings that would benefit staff (C5) and build capacity.

- At most locations, tribal staff are fully engaged in carrying out ongoing forestry operations and lack capacity to take on new initiatives even if those initiatives will streamline processes and result in more cost-effective program execution (H10).

#### **4. Roads, facilities, and enforcement on tribal forests are in dire state.**

- BIA and tribal road systems are in very poor condition jeopardizing forest protection, water quality, and active forest management (A3).
- The overall condition of the facilities used for forest management are in poor or worse condition, posing safety and security issues. There are also needs for additional

buildings to house equipment that is being left outside. While the BIA facilities are in fairly good shape, tribal facilities are significantly worse in condition (A9).

- There is limited law enforcement on Indian forest lands for the protection of the natural resources (A7).

#### **5. Major challenges continue to exist for forest protection, forest health, and planning.**

- For most tribal forests, excessive stand density, high fuel accumulations, and insect and disease issues remain a major forest sustainability issue (B1). This is conflated with an overall decline in processing infrastructure resulting from federal policies that limited timber harvests on National Forest lands more than three decades ago. This situation has created immense impacts on tribal forest product industry

employment and revenue to tribes.

- Tribal forest managers face immense forest health challenges following 100 years of fire suppression policies and historic fire suppression. Current Incident Management Teams (IMTs) who are generally not trained in tribal values, management, and culture are assigned to work on tribal trust lands on incidents. This is a significant issue for tribes due to the conflict between forest health, cultural and archeological sites, and wildfire suppression tactics.
- A 500,000-acre backlog of precommercial thinning treatments remains since the IFMAT III report despite the pressing need for density regulation (B2). Implementation of hazardous fuels reduction treatments is often made difficult by the separation of traditional



forestry and fuels management units (B3).

- Woodland forests are in need of restoration (J12) and are increasingly being treated for fuels hazard reduction, range/forage improvement, fuelwood gathering, food security, and carbon sequestration; however, those goals are not well articulated, and funding is often done outside the BIA. The carbon status of woodlands and woodlands research is limited. BIA guidance for woodland planning and management needs to be strengthened and better integrated into the forest management plan (B8).
- There is thirty years of documented dissatisfaction with grazing, protection from trespass and poaching and other underserved values (such as access to culturally important plants) (V2).
- Wild horses and burro (WHB) populations continue to damage forests and watersheds in Indian Country, particularly in the West. Funding for wild horse control remains far below those provided to other federal agencies. Tribal participation in federal programs to control wild horse and burro populations is not occurring. Funding appropriated for WHB issues is not being shared across the Department of the Interior (A8).
- There is a lack of forest insect, disease, and invasive plant staff positions in tribal programs and the BIA to be fully engaged in addressing these threats (B9).

*Redwood trees located on the Yurok's ancestral lands, California.*

PHOTO CREDIT: ADRIAN LEIGHTON





*Maple syrup collection tube network run by the Passamaquoddy Tribe in Maine.* PHOTO CREDIT: VINCENT CORRAO

- Lack of additional timber sales that are “shelf ready” makes it difficult to take advantage of fluctuating market conditions. Few tribes have more than one year’s access to commercial volume for marketing purposes, reducing the opportunity to capture high market conditions (D4).
- Few tribes complete the sale layout of their AAC volume and this shortfall in annual sale volumes results in annual revenue losses (D4). Most tribes lack the process to evaluate whether the tribe is receiving fair market value for their forest products (D7).

- Maintenance of planning inventories and Forest Management Plans (FMPs) is not keeping up, especially regarding climate change. FMPs are not updated to include new techniques and ideas such as monitoring, climate change, forest health, modern planning techniques, carbon goals and accounting, sustained yield management practices to promote forest resilience, and new approaches for calculating the AAC (F1/F2).
- Many FMPs do not integrate with other plans such as non-trust land management, woodland management, non-

timber forest products (NTFP), transportation, tribal business, and hazardous fuels mitigation plans (F3).

- Forest inventory work is lacking yet needed for developing modern forest plans. Forest Inventory and Planning (FIP, formerly the Branch of Forest Resource Planning, or BoFRP) is not able to keep up with the needs of the BIA and tribal Forest Management and Inventory Planning (FMIP) needs (F8).
- The gap between the aggregate Allowable Annual Cut under current management plans and the volume offered for sale continues to grow (F6).
- In many areas there is a lack of manufacturing infrastructure resulting in poor markets and in some areas no market for the harvested products (D11).
- Suppression activities during large wildfire incidents are increasingly inconsistent with tribal goals (B6).

#### **6. Cross cultural relationship building, and landscape-scale management projects are needed.**

- Indian forests are being showcased as models of good stewardship which should be applied to management of federal lands (J2). There is overwhelming tribal member support (82%) for involvement in the management of federal lands (V3) yet capacity and funding to carry out projects is limited (J1/J5/K7). Projects are also hindered by rotating leadership of federal partners (J4) and, unfortunately, new



*An active timber harvest unit on the Quinault Reservation in western Washington.* PHOTO CREDIT: VINCENT CORRAO

authorities aimed at promoting tribal partnerships may often benefit the partners more than the tribes themselves (J7). A champion is needed on the tribal side as well as on the federal side to keep the collaborative process moving forward (K2). Federal agencies' views on co-management and co-stewardship should be clarified and the tribes should be included in funding discussions regarding these projects (K4).

- Prescribed fire, including cultural burning, is a consistently mentioned tool that tribes want to utilize in cross-boundary projects. However, this is often the most complex, although very critical component of many silvicultural treatments. Fire planning needs

cooperation among multiple agencies, landowners, and municipalities and without agreements in place this limits progress (J8). Presently there are not enough trained fire management qualified personnel in Indian country (K10).

- Fractionated, highly allotted tribal lands are especially challenging when promoting landscape-scale cross-boundary projects (J13).
- 7. There is a need for policy reform and increased education regarding available pathways to self-governance to fulfill the trust responsibility.**
- NIFRMA is one of the most recently legislated major federal forest policies and the ultimate basis of BIA Forestry rules and

regulations, but the legislation is over 30 years old and should be reviewed for relevance and applicability with current conditions, particularly the rapid progression of tribal self-governance (E1).

- There are two divergent BIA forestry functions: direct service to tribes and working with self-governance tribes. It is not clear that BIA Forestry is adequately funded and staffed to do both at the required scale (E6). Furthermore, BIA staff have outdated resources (such as basic computer programs), oftentimes lack basic program information (G11), and show limited attention to some requirements in NIFRMA (A4, F1, G11).



*Landscape management on the Makah Reservation, Washington.* PHOTO CREDIT VINCENT CORRAO

- There are special concerns/benefits for tribes and BIA in carrying out forest management activities under ITARA and self-governance generally. BIA rules and procedures have lagged the advance of self-governance (E3) creating limited progress and understanding of ITARA demonstration projects (G17). ITARA promises self-governance benefits for interested tribes. However, many tribes have little or no knowledge about ITARA (E11). Tribes carrying out forest management activities under ITARA are performing functions previously considered inherent federal functions performed by the BIA (H9), yet funds are not made available to the tribes for these additional responsibilities (Table SG.1).
  - Levels of BIA service vary greatly between self-governance, self-determination, and service-provided tribes due to BIA regional policies and funding mechanisms (F7) which adds another layer of confusion.
  - Many tribes feel that the BIA requirements are burdensome in that they take up an inordinate amount of time, and do not always support the tribe in their goals and objectives (D12). For instance, the timber cruise accuracy standard of 5% for realty and timber sale transactions is difficult to achieve and often requires a 100% cruise of timber stands. This presents further challenges for limited staff in tribal forestry departments (G10). There is a misunderstanding by some BIA and tribal personnel, that the BIA handbooks and manuals must be followed by self-governance tribes (G7).
  - Currently the BIA has no program review policy or procedure to evaluate BIA direct service (G8).
- 8. Many other challenges exist for tribal forests.**
- Tribes are increasingly acquiring fee land, some of which is brought into trust, and acquired fee land is often not within the reservation boundaries (H2).
  - Centralization of wildfire suppression programs (national and regional control of allocation of resources) has had serious negative impacts on tribal ability to respond quickly at the local level and keep fires

small (H4). Fire suppression tactics implemented by Incident Management Teams (IMTs) are degrading timber and other cultural resources on thousands of acres of Indian forest land while attempting to manage large wildfires. These outside teams with no direct relationship to the reservation land and resources are risk averse and often prefer indirect attack using backfires far from the fire front. This often results in the destruction of timber stands on many acres of tribal forestlands that did not need to be burned to contain the fire (H5).

- Many tribal communities do not have sufficient local mills and log markets to support a viable wood products economy (D11). The BIA and some tribes themselves have invested in milling infrastructure, but most tribal mills (especially those dealing with small diameter material) have had limited success. However, the ecosystem services and tribal employment that tribal mills can provide are often undervalued (D13).
- Some tribes express interest in selling timber using direct log sales instead of selling stumpage. BIA's timber sales policies and procedures are designed for stumpage timber sales unless the tribe has established a tribal forestry enterprise under CFR 163.13. BIA's process for creating and securing approval of tribal enterprises can be overly complex and involve multiple reviews and delays (H7).

- BIA forestry regulations and policies restricting delivered log sales need to be reviewed and reforms implemented to facilitate timely creation of forestry enterprises or other acceptable processes for log sales. BIA needs to improve communications to provide other current options for log sales (D8).
- There are differences in the nature and levels of involvement of the forestry program in voluntary carbon market arrangements and other ecosystem services, although the shorter time frames and greater flexibility have piqued

the interest of many tribes. Carbon market arrangements have often been led by tribal government, sometimes with little input by the forestry program. IFMAT was unable to determine if funds are being reinvested to support forest management. DOI solicitors' opinion found that carbon is not a trust responsibility. While there are carbon market protocols for both forests and grasslands, woodlands are currently not eligible as a source of projects. There is no single set of standards, guidance, or principles for assessing and managing climate-related forest vulnerabilities.



*Culturally significant cedar bark stripping on the Coquille Reservation in Oregon.*

PHOTO CREDIT: MARK RASMUSSEN

# Major Recommendations

## Achieve funding parity:

- Revise the federal funding model to provide for basic land stewardship costs including hazardous fuel reduction and roads, plus additional support for active timber management, consistent with tribal goals (A1).

Review statutory, regulatory and policy requirements for Indian forest management including budget justification and reporting processes and determine needed reforms to address a change in the balance between timber production and

stewardship. This includes an increase in annual funding by \$96 million to support forest stewardship and timber harvest for Indian forests to reach parity with National Forest and BLM funding on their respective land classifications, an increase in fire preparedness funding by \$42 million (A2) as well as establish a separate DOI Budget Justification (Green Book) line item for tribal forest roads with a target of eliminating the forest road maintenance backlog over 15 years with a budget of at least \$89 million per year (A3). With the responsibilities for management of federal lands (including tribal lands) being similar, these increases reflect the principle of equal pay for equal work (C1).

- Increase BIA funding by Congress to at least fund the minimum staffing needs established by NIFRMA for Tribal Forestry Programs (A4).
- Provide adequate funding for law enforcement (trespass) on Indian forest land (\$3-5 million per year) (A7).
- Achieve parity with the Forest Service and BLM to address the current overpopulation of wild horses, up to \$40 million may be needed (A8).
- Increase base funding that allows for direct investment in staffing for all tribes and for the BIA to support self-governance. Rather than funnel budget increases into project funds, there needs to be sufficient TPA funds to fulfill the NIFRMA mandate that each tribe receive an adequate amount to support an appropriate



Upper Klamath River in California, critical salmon habitat for the Karuk Tribe.  
PHOTO CREDIT: VINCENT CORRAO



Road repairs needed for the Chugachmiut in Alaska. PHOTO CREDIT: NATHAN LOJEWSKI

- number of forestry staff to implement the FMP approved by the Secretary (C1).
- Funding agreements for contract services and compacts should include budget for staffing and should compensate tribal staff at a GS level equivalent to what a federal worker would be paid. This will allow tribes to become more competitive in a workforce beset with scarcity (C1).
- Adjust the balance between recurring funding and nonrecurring forestry funding to fully fund the forestry workforce and annually adjust federal funding to recognize inflation (A5). Recurring and nonrecurring funding needs to be increased to levels commensurate with federal neighbors.
- Reform the system of funding so that “project” funding comes to tribes for the broader “Forest Management Activities” as defined in 25 CFR 163, rather than narrow and more specific criteria (H11).
- Develop mechanisms to provide funding to bridge (A6) the time between seasonal operations and when appropriations are received.
- Initiate an independent review of adequacy of BAER and BAR funding and staffing for Indian lands is needed and necessary actions taken to ensure sufficient funds are allocated to fulfill the Secretary’s trust responsibility and NIFRMA’s statutory objective of maintaining Indian forest land in a perpetually productive state. Reform policy and procedures for administering BAER and BAR funds to align with project implementation requirements (H6).
- Redirect funds to tribes retained by the DOI/BIA for performing functions previously considered inherent federal functions but now carried out by tribes under ITARA. This reform would shift funds from the BIA to the tribes who are actually performing the functions and provide additional funds for tribes to achieve tribally defined state-of-the-art forest management (H9).
- Adequately fund and staff tribes to implement cross-boundary projects (J1) and recurring funding must be sufficient to maintain tribes existing forestry needs before a tribe can take on additional responsibilities (K7). Allow tribes to retain receipts from federal Good Neighbor Authority (GNA) projects,

similar to states and ensure that cross-boundary authorities, initiatives and projects also serve tribal entities, not just their partners (J7). Create a specific non-competitive funding source for tribes to apply to that facilitates building relationships with neighbors (J6). BIA needs to provide opportunities for more tribal certified NASP training and/or provide the technical support for landscape projects (K9).

### Defining the governance structure of tribal forestry for the future:

- Initiate a special independent commission to 1) evaluate the need to restructure and/or consolidate the BIA, 2) conduct a balanced assessment of potential positive and negative impacts for both tribes and the BIA of increased numbers of tribes moving to self-governance, 3) what or how should the BIA be structured (E3) and 4) reassigning regions that are based off cultural-ecological characteristics rather than geographical boundaries (such as merging Maine tribes with the Midwest BIA region rather than being in the Eastern region). Consider strategically located forestry BIA service centers that tribes are allowed to reach out to based off their needs.
- IFMAT IV recommends the Secretary of the Interior extend the ITARA Demonstration Project indefinitely (E12/G17). Funding, policy, and procedural guidance concerning ITARA implementation needs to be provided to BIA Regional offices

(C10). Establish a training program that provides BIA officials and tribal leaders with better strategies of engaging with self-governance tribes through a spirit of government to government and consistent with Congressional policy rather than domination (G16). Sources of funding should be identified, and information provided to tribes about how to secure needed funding to participate in the ITARA Demonstration Project (H10).

- Streamline the process of converting fee land into trust land (G10).
- Clarify the relationship between BIA and tribes with respect to acquired fee lands. Allow tribes to integrate management of trust and fee forestlands, and co-management agreements into a single FMP (H2).
- Review, under ITARA, the context of the Secretary's trust responsibility and its fulfillment and changes in performance of inherent federal functions including related funding issues (G18).
- Review the relevancy and effectiveness of "forestry programs of the BIA" to address contemporary needs of tribes (G3) given the increasing trend of SG tribes. Rebrand the BIA to be a champion of tribal forestry that emphasizes support rather than having a focus on being a regulatory/compliance agency.
- Incentivize and reward tribes and federal agency staff that successfully move collaborative and co-management processes forward. Encourage partners and tribes to maintain leadership

for the duration of large-scale cross-boundary projects (J3). Performance evaluations should encourage federal employees to successfully utilize collaborative and co-management processes. As personnel leave positions, a checklist of duties and responsibilities incorporated in a plan needs to be completed for a smooth transition (K2).

### Address immediate threats to tribal forests:

- Increase the rate of thinning to reduce stocking and improve forest fire resiliency. Utilization of thinning material is critical to improving forest health. Revise hazardous fuels reduction rules to integrate with thinning activities (D11).
- Provide specific, "capacity building" training by the BIA for tribal foresters and technicians who may not have a strong background in forestry specific education. Such training could take the form of a "boot camp" that would prepare such foresters to be successful and would qualify them for entry into the National Advanced Silviculture Program (NASP) (C4). Training, education, and mentoring programs targeted at timber sales management need to be implemented at the BIA and tribe at all levels (D1).
- Expand "strike team" model to create small, experienced teams that can assist tribes in technical areas of need including BAER, NEPA, geospatial analysis, forest inventory, carbon accounting and verification, roads, water and hydrology issues and other technical services (C6).





*Camas returning to the Jocko Prairie after prescribed burning conducted by the Confederated Salish and Kootenai Tribe in Montana.* PHOTO CREDIT: SERRA HOAGLAND

- Quantify the changes from AAC emphasis toward other forest values, while encouraging tribes to include all important values in their management plans. Review BIA rules and procedures regarding AAC, particularly non-declining even flow. Determine if there is a need for more flexibility in the implementation of BIA AAC rules. Overstocking needs to be reduced to have resilient forests in the face of increased fire risk and AAC rules should allow and encourage this (E7).
- Revise the policies surrounding non-expiring forest management plans to ensure that plans are monitored, reviewed, and updated to meet tribal priorities including the AAC (F1/F6).
- Evaluate the mission of FIP (formerly BoFRP) to better adapt to the current needs of not only the BIA managed programs but all tribal programs (F8).
- Initiate an independent review of the federal rules and policies which restrict use of local fire suppression resources, especially for initial attack, and the process for allocation of national resources for fire suppression on Indian lands (H4/H5).
- Update the paid permit limitation of \$25,000 and continually revise to allow for inflation and to better meet current needs for commercial timber harvest using this authority (H8).
- Reduce the barriers to getting fire back on the landscape where needed for more resilient landscapes and cultural objectives (J8). Training for fire qualifications needs to be re-evaluated and ramped up to meet the demand to use managed fire on a landscape basis. Cooperative agency training for managed fire program should be implemented similar to The Nature Conservancy Indigenous burning network. Cooperative burn plans need to be developed so multiple agencies can participate in prescribed burn projects (K10).



Seedling container operation at the Red Lake Nation in Minnesota. PHOTO CREDIT: VINCENT CORRAO

## Supporting Recommendations

- Improve the BIA's understanding of the needs and conditions of the forestry facilities and appropriate funding (including outbuildings and IT components) (A9).
- Encourage coordinated development of annual plans on each reservation for integrating all forest management activities and hazardous fuel reduction activities (B3).
- To increase efficiency, evaluate creating a forest protection unit that includes fire, insect, and disease management programs (B9).
- Provide NTFP support for each region to provide technical assistance to tribes to fulfill their NTFP goals. This would support tribal hunting and gathering initiatives and promote health and wellbeing within tribal communities (NTFP1).
- The BIA should identify an independent audit process to evaluate fair market value for forest products (D7).
- BIA/Tribes need to explore other revenue options such as carbon, biofuels, biomass use, water, wildlife, recreation, or other natural resource uses (D11).
- IFMAT IV recommends a review of the current applicability of NIFRMA given the recent shift toward self-governance by many tribes. Recipients would include ITC and Congress (E1).
- BIA, in coordination with the ITC, should develop a table of authorities for self-governance tribes (compact, contract, and direct services). This should include the allottees (H1). Modification of CFRs should be based on the findings from this table.
- BIA forestry regulations and policy restricting delivered log sales need to be reviewed and reforms implemented to facilitate timely creation of forestry enterprises or other acceptable processes for log sales. BIA needs to improve communications to provide other current options for log sales (H7).
- Increase systematic technical and academic support for tribal climate change planning (I3).



**Assessment of Indian Forests and  
Forest Management in the United States**

**Executive Summary**

The Fourth Indian Forest Management Assessment Team  
for the Intertribal Timber Council

**2023**

