

Sonny Perdue, Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

October 13, 2020

Victoria Christiansen, Chief of the U.S. Forest Service
U.S. Forest Service
Sidney R. Yates Federal Building
201 14th St SW,
Washington, DC 20227

To Honorable Secretary Perdue and Chief Christiansen:

The Tribal Nations of Southeast Alaska represented below are deeply disappointed with the release of the Final Environmental Impact Statement (FEIS) for the Alaska Roadless Rule (AKRR) process, in which the Secretary of Agriculture has identified the full exemption as his preferred alternative. As cooperating agencies, each of our Tribes came to the Alaska Roadless Rulemaking process with different priorities and perspectives, each of which was based on what we viewed as the right solution for our communities. You may recall that although we differed in the alternatives that we supported, we were united in our opposition to a full exemption. Despite the collaborative effort that went into crafting and refining other alternatives for the Alaska Roadless Rule, the Secretary has chosen the least nuanced option that will, unfortunately, bring the most discord to our region. As cooperating agencies, we refuse to endorse this Final Environmental Impact Statement and the preferred alternative it contains. Thus, we are writing to inform your office that our sovereign nations, the Organized Village of Kasaan, the Hoonah Indian Association, the Hydaburg Cooperative Association, the Angoon Community Association, and the Central Council of the Tlingit and Haida Indian Tribes of Alaska, are formally revoking our cooperating agency status in the Alaska Roadless Rule process. We request that an updated version of the Final Environmental Impact Statement be released to reflect our collective withdrawal from this process.

Our Tribes originally signed on as cooperating agencies to this process so that we would be at the table where decisions are being made, and ensure that our people and our Tribe would have a voice in this process. As the Forest Service recognizes in the FEIS, we also have valuable knowledge and expertise to contribute to this process: “The tribes were invited to be cooperating agencies due to their specialized knowledge and expertise of land management, subsistence, natural resources, and potential impacts to communities within Southeast Alaska” (AKRR FEIS, 1-7). Before the events of August 2019, our work as cooperating agencies involved tweaking alternatives to try and find a solution that worked for everyone. We recognized that compromise was likely necessary to reach an alternative that we could all support. However, when a full exemption was selected as the preferred alternative due to undue political interference in the rulemaking process, the months that we spent working to find a good-faith compromise were discarded in favor of political expediency. Unfortunately, our specialized knowledge and expertise were not taken into account with the selection of a full

exemption as the preferred alternative; rather, this alternative is an affront to the public process and collaborative effort that our Tribes put into this rulemaking.

After two years of consultations, meetings, providing input and commenting on drafts, the release of the FEIS shows that our participation in this process has not actually led to the incorporation of any of our concerns in the final decision. **We refuse to endow legitimacy upon a process that has disregarded our input at every turn.** Our Tribes have no intention of being party to a decision that will lead to the degradation of our homelands and our way of life. We will not 'cooperate' with the Forest Service's attempts to move through their checklists in order to fulfill NEPA requirements. Blatant disregard for our input during the NEPA process over the past two years is a disregard for the mandates of the law. We aimed to be a collaborative partner in this process, to work with the agency towards the best interest of our homelands on the Tongass. The selection of a full exemption as the preferred alternative in the FEIS closes the door to any further collaboration in the AKRR process, as the agency has shown that they have no interest in addressing the concerns of our Tribes, and the public at large. We do not wish to confuse the American people into believing that the listing of our Tribes as cooperating agencies on the first page of the FEIS means that the final recommendation made by the document is in any way reflective of the input that we gave during the rulemaking process.

The Forest Service has stated that their mission of 'caring for the land and serving people' includes the directive of "Listening to people and responding to their diverse needs in making decisions." The only people that have been listened to and have had their needs addressed in the Alaska Roadless Rule process are industrial resource extraction interests, and our elected officials that support these special interests. The support coming from our elected officials for a full exemption is disregarding their constituents, undermining the public process, and ignoring the input and concerns of our sovereign Nations.

Industrial scale resource development on the Tongass is not the economic panacea for our region that our Congressional delegation makes it out to be. Real, sustainable economic development that benefits the communities on the Tongass is complex and different for every community. That is why we have taken the time to discuss ideas for durable, practical solutions for land management on the Tongass with your agency, during the rulemaking process. We were disheartened to find that these ideas and our collaborative effort were met with disregard. Some of our Tribes have thus taken a different avenue to propose these solutions to the Forest Service in the form of our petition for a Traditional Homelands Conservation Rule, which includes a comprehensive set of recommendations to the agency to help increase economic development, local employment, and stewardship opportunities. As the original inhabitants of this land, we are invested in finding solutions for our future and continued prosperity in this region. A full exemption from the Roadless Rule does not work towards creating solutions for our future; it does not contribute to our shared prosperity. It only increases our distrust of the agency, generates ill will amongst our communities, and exacerbates the conflict on the Tongass that is unproductive to furthering projects and initiatives.

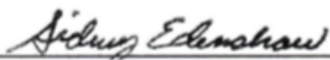
If the USDA and the Forest Service decide that they would like to invest in solutions that will tend the land they hold and actually serve our people, we encourage them to adopt our petition for a

Traditional Homelands Conservation Rule. We are ready to participate as a cooperating agency in a rulemaking process that will have real benefits for our people, and our homelands.

Sincerely,



Ronald Leighton
President of the Organized Village of Kasaan



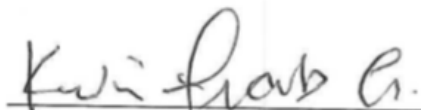
Sid Edenshaw
President of the Hydaburg Cooperative Association



Richard Peterson
President of the Central Council of Tlingit and Haida Indian Tribes of Alaska



Robert Starbard
Tribal Administrator/CEO of the Hoonah Indian Association



Kevin Frank
President of the Angoon Community Association

Cooperating Agencies Response
AKRR FEIS 2020

cc:

Michael Dunleavy, Governor of Alaska

U.S. Senator Lisa Murkowski, Chairman, Senate Energy and Natural Resources Committee

U.S. Senator Daniel Sullivan

U.S. Representative Don Young

Chris French, USFS Deputy Chief

Christine Dawe, USFS Director of Ecosystem Management

Melinda Burke-Hernandez, USFS R10 Tribal Program Manager

Kenneth Tu, USFS IDT Team Leader, Alaska Roadless Rule