



Craig Tribal Association

December 17, 2019

The Honorable Sonny Perdue
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

Dear Mr. Secretary,

The Craig Tribal Association, a federally recognized tribe, respectfully submits its comments on the Alaska Roadless Rule Proposed Exemption. The Craig Tribe has participated in previous comments on the development of land and resource management that may alter the ability of tribal citizens to harvest and use resources on the Tongass National Forest. The Craig Tribe has knowledge relevant to the proposed Alaska Roadless Rule issue and its potential effects on Southeast Communities, having enjoyed an intimate connection with Haa Aani (Our Land) since time immemorial.

The U.S. Forest Service recently issued an Alaska Roadless Rule Draft Environmental Impact Statement (DEIS) which the Craig Tribe does not believe is an acceptable document to satisfy the environmental impact requirements of the National Environmental Policy Act (NEPA). In the DEIS, references are made to the 2016 Forest Plan FEIS. Since most of the tribes in Southeast Alaska, significantly impacted by this DEIS, do not have access to the 2016 Forest Plan FEIS, and since the Craig Tribe has learned that the 2016 Forest Plan FEIS contains data from outdated studies completed in the 1980s and 1990s, the Craig Tribal Association does not believe the 2019 DEIS meets the intent of NEPA.

Exemptions have existed in the 2001 Roadless Rule providing for mining activity, hydro development and communications activities. The only significant development limited has been the roadbuilding to logging areas in the Tongass National Forest. If the 2016 FEIS will not be changed to allow for more logging activity, there is no reason to change the 2001 Roadless Rule designation. The Craig Tribe believes the analysis in the DEIS is insufficient and does not meet the intent of NEPA or the responsibilities of the Forest Service agency under ANILCA Section 810 to describe and analyze subsistence uses on a community scale.

ANILCA Section 810 requires Federal land management agencies to evaluate the effects of the proposed action on subsistence uses and needs. If an agency finds that their action may significantly restrict subsistence users, it is prohibited from implementing that action

prior to taking certain steps. In the 2019 DEIS, the U.S. Forest Service is relying on data gathered in the 1980s and 1990s, at the same time stating that the 2016 Forest Plan FEIS may change to allow more timber harvest. This timber harvest may significantly restrict subsistence users in that area, and the steps outlined in ANILCA Section 810 require a plan that would demonstrate reasonable steps that will be taken to minimize adverse impacts upon subsistence uses and resources resulting from such actions. The outdated data the U.S. Forest Service is relying upon does not seem sufficient to satisfy this requirement for current subsistence users in Southeast Communities effected by the proposed Alaska Roadless Exemption.

Recently the Craig Tribal Association joined with the Organized Village of Kake, Organized Village of Saxman, Hydaburg Cooperative Association, Wrangell Cooperative Association and the Yakutat Tlingit Tribe to work with the U.S. Forest Service as a collaborative agency to work constructively with all elected officials on this issue. However, we are not a collaborative agency, the Craig Tribal Association is a federally recognized tribe, we are a tribal government and our voices and concerns should be received as government to government consultations. The Craig Tribal Association along with the above-mentioned tribes signed a Memorandum of Understanding (MOU) in good faith to provide local expertise and knowledge of how changes to the 2001 Roadless Rule may impact areas with our traditional boundaries.

During the public testimony process, Southeast tribes and communities were united and provided extensive testimony on the Alaska Roadless Rule and No Change to the existing rule has been the overwhelming recommendation. Subsistence users and tribal citizens of these Southeast communities stress the importance of healthy fish and wildlife habitat to support their subsistence harvesting. These testimonies have been disregarded with the recent recommendation of the U.S. Forest Service for full-exemption to the 2001 Roadless Rule.

The Craig Tribal Association supports long-term benefits of maintaining large tracts of old growth forest within the Tongass National Forest. Maintaining large blocks of biologically diverse old growth forest is crucial to protecting subsistence resources on a large watershed level scale. In light of the human induced ecological changes in the Tongass National Forest and the progressive environmental degradation that has taken place in forested areas as a result of heavy logging and roading, the Craig Tribal Association supports the restoration and rehabilitation of the Tongass National Forest to its natural state.

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Thank you for the opportunity to provide input in this process, however, we continue to maintain our consultation process should in the form of government to government, and not through a public comment period. We respectfully request an opportunity to meet and discuss this further.

Sincerely,

A handwritten signature in black ink that reads "Clint E. Cook Sr". The signature is written in a cursive, slightly slanted style.

Clinton E. Cook, Sr.
Tribal President