

**Feedback on Alaska Roadless Rule Discussion
with
Ketchikan Indian Community Our Way of Life Committee
Tuesday, September 4, 2018 - 5:30 – 7:30 p.m.**

Tuesday evening, Daryl Bingham and I engaged with the Ketchikan Indian Community (KIC) at their Our Way of Life (OWL) Committee Meeting. After Daryl provided the District updates, I discussed the topic of the Alaska Roadless Rule. I used some of the materials that were on the public websites as well as materials provided by Carla Casulucan to Debbi Gardunio and forwarded by you on Tuesday to prepare.

I explained that the State of Alaska had petitioned the Secretary of Agriculture to exempt the Tongass from the Roadless Rule, and that on June 1, 2018, the Secretary of Agriculture directed the Chief of the Forest Service to initiate a state-specific rulemaking for roadless area management direction for the Tongass National Forest on behalf of the Department. I explained that roadless areas are administrative designations - not statutory designations like Wilderness - and the Secretary will be the Responsible Official. I explained that this would be a rulemaking process and that an EIS would be prepared that would allow stakeholders, tribes and the public to engage. I mentioned that this process has an accelerated timeline similar to that of the 2016 Forest Plan Amendment planning effort (June 1, 2020—publish a final Alaska Roadless Rule). I stated that this was being led by the Washington Office. I also quoted this statement from the Talking Points, "A state-specific roadless rule would determine which currently designated roadless areas in the Tongass National Forest would require a different management designation to further Alaska's economic development or other needs, while still conserving roadless areas for generations to come."

The OWL committee members had several questions and some concerns were expressed as documented below.

- Feels that the agency is not following the government-to-government consultation process. Regarding the July 30, 2018 letter they received inviting government-to-government consultation, they believe they weren't given enough time to consult with the agency prior to engaging the public by publishing the August 30, 2018 NOI and scheduling public meeting in Ketchikan on September 17, 2018.
- Asked how KIC could be a cooperating agency with a Washington Office-led Roadless Rule Interdisciplinary Team (IDT). Would a tribal government employee or designee be expected to travel to DC to attend IDT meetings?
- Expressed concerns that the State did not engage Southeast Tribes to hear from them before petitioning for a roadless rule exemption.
- Regarding the State advisory committee, they asked who would be representing the "Federally recognized Tribe in Alaska" position on this committee and were concerned that a tribal government representative from outside Southeast Alaska may be assigned.
- There was an assumption that Richard Peterson (Central Council of the Tlingit and Haida Indian Tribes of Alaska) may be assigned to the State advisory committee, and expressed concerns about KIC (or other tribes in Southeast Alaska) being represented by Mr. Peterson .
- Uncomfortable with this EIS being led by the WO and not being able to have local interactions with Tongass staff who understand local tribal culture.

Among the comments received during the OWL committee meeting was a reference to Tribal participation in past Forest Planning efforts.

KIC Tribal Council members Gloria Burns and Irene Dundas spoke about prior engagement with the Forest Service regarding land use in the Bostwick Inlet area on the south end of Gravina Island. Those discussions are reflected on page 42, paragraph 3 of the 2008 Forest Plan ROD, which states:

KIC recommended changing the LUDs in the Bostwick area from development to non-development. Consequently, I am modifying Alternative 6 as displayed in the Final EIS to change the LUD allocations in the Bostwick Inlet area to a combination of non-development LUDs. I am also deferring timber harvest in the development LUD to the west and south of Bostwick inlet to Phase 3 of the Timber Sale Program Adaptive Management Strategy. Only if the timber industry expands to levels of harvest sufficient to implement this last phase could timber sale planning be done for this area.

The specific concern was that creating a State-specific roadless rule might modify or eliminate specific protections from development provided to areas such as Bostwick Inlet. In general, the OWL Committee, continued to express concerns that if they are not represented, and laws ensuring government to government consultation aren't followed, these areas they consider sacred could be lost.

Just for some context about Gravina Island discussions with KIC, the District Ranger or designee has been a regular attendee at monthly full Tribal Council and OWL committee meetings. Historically, each time a project or activity is proposed on Gravina Island - whether it is state or Federal – Tribal Council members have brought up concerns regarding effects to sacred places, and other cultural and subsistence uses. The Council has emphasized that subsistence uses go beyond hunting and fishing typically considered, but also include berry picking, bark gathering etc.

/s/ Susan A. Howle, District Ranger