

CHILKAT INDIAN VILLAGE



**An Indian Reorganization Act Village
Under Act of Congress June 18th 1934**
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Mr. Frank Sherman, Supervisor
Tongass National Forest
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Submitted via <https://cara.fs2c.usda.gov/Public/CommentInput?Project=64039>

Dear Supervisor Sherman,

On behalf of Chilkat Indian Village (Klukwan), we thank you for the opportunity to provide comments on the draft Assessment reports supporting the revision of the Tongass National Forest land and resource management plan (herein “forest plan” or “plan”). Our Tribe’s traditional territory encompasses lands and waters from Berners’ Bay north to Stonehouse Creek, in what is now called British Columbia. We have stewarded these lands since time immemorial and we continue to practice this stewardship today. All of the waters and lands within our traditional territory and also within the Tongass National Forest are an integral part of our ancestral homelands. These places include but are not limited to, *Káak’w Xán* (by the little man), on the Juneau Icefield, *Káak’w Xanseiyí* (area below the little man) on the edge of the Juneau Icefield, *S’alwán* (Sullivan Island and *S’alwán T’áak* [Back Side of S’alwán] the mainland west of Sullivan Island). These lands not only provide sustenance and spiritual grounding but also are critical to the ecological balance and economic prosperity of Southeast Alaska. Our stewardship practices have preserved these ecosystems for millennia, and our continued involvement is essential to ensuring their resilience. The forest and the waters of the Tongass comprise the homes for our relatives, what the US Forest Service calls “natural resources” that our people have always depended on for our physical, cultural, and spiritual sustenance. Our people include all beings living on the land. These relationships include all five species of wild Pacific salmon, many berries – soap berries, salmon berries, blueberries, cranberries, and important medicines such as *S’áxt* – Devils Club, to sustain not only our diets but also our ceremonies and ecological, stewardship traditions and our relationship to land. This is why one of the highest priorities for our Tribe has been the protection of the traditional and customary hunting, fishing, and gathering areas within our tribal territory.

Chilkat Indian Village (Kluwan) is the federally recognized Tribal Government for the Jilkáat (Chilkat) *Kwáan* Peoples. In Tlingit, *Kwáan* reflects an interwoven identity of land and community, underscoring the core value that traditional ways of life have been rooted in this land since time immemorial. *Kwáan* also reflects all species that live on the land. The Chilkat Indian Village of Klukwan (*Tlák’w Aan* – Eternal Village) steward natural and cultural resources in the Chilkat Valley, but our relationship and responsibility to the Tongass National Forest is much broader than just the site of our village. Because *Kwáan* represents a people and a place, we feel

a deep sense of responsibility to *yakgwahéiyagu*- the living spirit inside of all things. *Yakgwahéiyagu* is a sacred word in Lingít and often refers to the ability of everything to comprehend language and intentions, and this concept forms the basis of respect and how Lingít people develop their worldview.

Our Tribal government responsibilities within our Constitution include protecting *Haa Héeni Áyá, Haa Aani Áyá* (This is our water, this is our land), which is vital to subsistence, cultural heritage, and community livelihood. The Klukwan Constitution mandates us to “protect the natural environment and cultural resources” of its people. Our traditional territory stretches from the northern point of Berners’ Bay to Stonehouse Creek in British Columbia, over 2.6 million acres of lands and waters of which over 70% is contained within the boundaries of the Tongass National Forest. In addition, our traditional territory does not limit us to ensuring protection for places where our roots started. Our Clan’s origins extend to the Southern Tongass, to a place called *Gaanax* in Behm Canal, now called Port Stewart. Our Peoples have migrated throughout the Tongass, our oral traditions, our knowledge, our place names, and our language reflect the importance of those migration paths. These are not only places we stopped, but places we lived, where we have a connection to land because we survived from the land. For us, as our clan the *Gaanaxteidi* clan who are the founders of Klukwan, our migration took us from *Gaanax* in Behm Canal to Prince of Wales Island and Heceta Island, to Sitkoh Bay and Angoon, then Taku Inlet, and then to Klukwan. We care about what happens in all of these places. For us, *Gaanax*, where our Clan originally traveled from, is a sacred place of our origins.

The revision of the Tongass forest plan represents an opportunity to address the ecological, cultural, and social challenges that have intensified since the United States Forest Service's assumption of the management of the Tongass. As stewards of the lands and waterways that now comprise the Tongass National Forest, we have nurtured these ecosystems since time immemorial, maintaining balance and resilience through our deep connection to the land, water, and natural and cultural resources that sustain our well-being.

This process is an opportunity to implement meaningful commitments to Tribal sovereignty and co-stewardship. The federal government’s Trust responsibility as enshrined in Joint Secretarial Order 3403, U.S. Department of Agriculture Departmental Regulation 1350-002, and the U.S. Forest Service Manual (FSM 1563), obligates the Forest Service to ensure that Tribes are full partners in managing the lands and resources that are our ancestral inheritance.

I. Recognition of Tribal Sovereignty and the Importance of Government-to-Government Consultation.

Chilkat Indian Village (Klukwan) unequivocally reaffirms our sovereign status and recognized rights to hunt, fish, gather, and protect resources on the lands now known as the Tongass National Forest. These rights are integral to the cultural, spiritual, and economic well-being of our people. The trust responsibilities of the United States, long recognized by the U.S. Supreme Court, Congress, and the Executive Branch, further reinforce the legal and moral commitment of the federal government to prioritize and uphold these rights in all forest management decisions.

In addition to the substantive protection and support of those rights, the United States fiduciary trust duties also implicate procedural obligations that require timely, meaningful, and decision-oriented government-to-government consultation. Rooted in the trust relationship, such consultation ensures the recognition and protection of Tribal sovereignty. Executive Order 13175, Joint Secretarial Order 3403, and U.S. Department of Agriculture Departmental Regulation 1350-002 all demand that consultation must be timely, transparent, and substantive, with the intent to reach mutual understanding and agreement.

While Chilkat Indian Village (Klukwan) acknowledges that our position in Northern Southeast Alaska has meant limited FS engagement with our Tribal government, many Tribes on the Tongass faced similar challenges with inadequate consultation processes, underscoring the need for structural changes to ensure meaningful government-to-government engagement.

Moving forward, the Tongass forest plan revision process shall ensure consultation is comprehensive, ongoing, and respectful by:

- Engaging Tribes at the earliest stages of decision-making and maintaining regular communication throughout all phases of planning, implementation, and monitoring.
- Providing adequate time for Tribal review and feedback on management proposals, respecting Tribal schedules and resource constraints.
- Ensuring consultation outcomes are actionable and enforceable, with commitments formalized through agreements and protocols co-developed with Tribes.
- Accountability in consultation by requiring written records of consultation outcomes, timelines, and actions to ensure accountability.

As Native Peoples who have lived with and stewarded these sacred forests and waters since time immemorial, we submit the following comments on the draft Assessment reports supporting the forthcoming revised land and resource management (forest plan or plan) for the Tongass National Forest. Prior iterations of the Tongass plan did not authentically include the perspectives or deep involvement of Alaska Native Tribes, Native Corporations, communities, or other Indigenous populations. Therefore, there is a **Need to Change** the Tongass Plan to incorporate these perspectives, address the desired outcomes of these peoples, and for the federal government to honor its trust responsibility toward Alaska Native Tribes and their interests. As suggested by former Secretary of Agriculture Tom Vilsack, revising the Tongass Plan presents the Forest Service with a meaningful opportunity to respond to the 2020 Tribal petition for a Traditional Homelands Conservation Rule, and to ensure that the long-term management and protection of traditional and customary use areas on the Tongass consider, respect, and provide avenues for implementing several Tribal and Indigenous needs and priorities.

II. General Comments.

Overall, while the assessments include useful information, they must do a better job of demonstrating the purpose and need for this plan revision. For example, climate change is one of the biggest stressors that face our community and the resources that we depend on. As such, these assessments must address specifically how climate change and the stressors it will impose

on the Tongass drive that Need for Change and how management must change holistically and adapt to respond to those changes.

We believe that those changes and adaptation can only be achieved through a concerted effort by the federal government to authentically and proactively engage Indigenous populations who have managed the lands and waters now known as the Tongass National Forest for much longer than the Forest Service's tenure. The agency must engage with us as sovereign nations and in a spirit of co-stewardship to develop a new forest plan that provides for true co-stewardship of the Tongass. Such a plan would include:

- **Co-Stewardship of Forest Resources:** The draft Assessments suggest the tremendous potential for co-stewardship of the Tongass between tribes and the Forest Service. The final Assessment must fully embrace this potential. This co-stewardship should involve shared decision-making, joint planning, joint research that is guided by tribal priorities, and collaborative implementation and monitoring of forest management activities. Co-stewardship can empower tribes in the stewardship of their ancestral lands, promote self-determination, and make more efficient use of limited federal resources.
- **Sustainable Forest Management:** The draft Assessments highlight the principles of sustainable forestry, but note that climate change and other stressors, including clearcut old-growth logging and the expansion of mining projects and tailing dams, are threatening the ecological integrity of Tongass forests. Tribes can partner with the Forest Service to manage forests for multiple benefits, including timber production for local and cultural uses, habitat improvement and adaptation for deer, salmon, cedar, and other species, and overall ecological integrity. This co-stewardship can ensure the long-term health and productivity of forests for future generations in the face of challenges from a changing climate.
- **Indigenous Knowledge (IK) Integration:** The final Assessment must emphasize the importance of incorporating IK in forest management practices. Tribes can collaborate by sharing their knowledge of local ecosystems, species, traditional culture, subsistence uses, and sustainable practices, information that must be protected from disclosure through Indigenous Knowledge sovereignty and confidentiality agreements. This collaboration can lead to more effective and culturally sensitive forest management strategies.
- **Collaborative Forest Restoration:** The draft Assessment reports discuss various forest restoration techniques. Tribes and the Forest Service can work together on restoration projects, combining IK with Western scientific approaches while strengthening opportunities for local economic and workforce development, and job opportunities for our tribal members. This collaboration can help restore forest health, enhance wildlife habitat, protect cultural resources, increase local economic security, and advance traditional cultural practices, and is a backbone of co-stewardship. The agency should build on and expand the multiple examples of successful collaborative forest restoration efforts that they already engage Tribes in, including community forest partnerships.
- **Economic and Workforce Development Opportunities:** The draft Assessments mention economic benefits associated with Tongass land management. Tribes can collaborate with the Forest Service to develop sustainable economic activities such as

ecotourism, traditional timber products (canoes, totem poles, etc.), non-timber forest products, sustainable traditional harvesting of deer and salmon, and cultural resource management. This co-stewardship can create jobs, generate income, provide continued access for tribes to traditional areas, and support tribal communities. ANILCA local hire is another specific tool of Alaska's National Forests that can increase economic opportunities for our tribal members, and the authority should be utilized for higher-level GS positions.

The final Assessment must also **establish the Need for Change**. The inclusion of the need for change in the Tribal assessment chapter is of paramount priority, and each chapter should endeavor to provide a similar rationale for why the Tongass plan must be updated to accommodate for different pressures and stressors on the function and condition of the watersheds and landscapes of the Tongass. The need for change should reflect the need to:

- **Strengthen Tribal Capacity:** Providing opportunities for Tribal capacity-building will help Tribes effectively participate in co-stewardship and co-management activities. Tribal workforce development should be a core part of agency activities and contracting. Likewise, expanding programs that engage Tribal youth in co-stewardship of the Tongass and management activities such as restoration, research, and building recreation infrastructure ensures that the next generation of stewards is ready to implement the Seventh Generations Principle.
- **Address Historical Trauma:** Acknowledging and addressing the historical trauma experienced by Indigenous peoples in the revised plan, and the agency's role in perpetuating this trauma, is crucial for building trust, improving Government-to-Government relationships, and fostering collaboration. The agency has taken steps to acknowledge the historical and generational trauma caused by the burning of smokehouses and fish camps across the Tongass, and how that dispossessed our people from traditional uses of their land. The Forest Service should continue its efforts to make its staff aware of these past injustices so that our Tribes do not have to assume the burden of educating a new district ranger or line staff every 2-3 years.
- **Develop Co-Stewardship Agreements:** The revised plan should facilitate the development and implementation of co-stewardship agreements that clearly define roles, responsibilities, and decision-making processes for both the Forest Service and Tribes.
- **Ensure Stable Tribal Funding:** Sustainable funding mechanisms are essential for the long-term success of Tribal co-stewardship initiatives, and the revised plan should identify these mechanisms and other opportunities for Tribal capacity development.
- **Steward Sites of Indigenous Importance:** The current forest plan direction does not adequately protect Tribal cultural, historical, and sacred sites, which threatens Tribal identity and culture. There is a related need to integrate Indigenous languages and place names into maps and other landscape identifiers and to develop management approaches at Tribal requests for the restoration of Indigenous cultural properties and infrastructure including but not limited to fish camps, seasonal cabins, and smokehouses.
- **Facilitate Tribal Subsistence Use and Stewardship of First Foods** and other cultural resources (e.g., salmon, cedar, deer, etc.), including by restricting non-Tribal access to and use of these resources.

- **Ensure Tribal and Indigenous Access** to terrestrial, aquatic, and marine cultural landscapes and ancestral homelands to facilitate the exercise of traditional and customary practices that reflect a reciprocal relationship between native people and the land and resources they steward.
- **Identify and Designate Lands of a Particular Character and Other Lands** (i.e., salmon strongholds, areas of known Tribal importance, etc.) as suitable for Tribal/native co-stewardship and eventual co-management.
- **Conserve Old-Growth Forests**, which are essential to the ecological integrity of the landscape and the provision of cultural resources and subsistence uses.
- **Recognize the value of salmon**, which have sustained our communities since time immemorial and are an integral part of the development of our societies on these homelands. Salmon have immense cultural value, as well as commercial and ecological value, and the need for change should reflect the need to restore degraded salmon habitat to a healthy functioning state, due to its importance for the cultural, ecological, and economic health of our communities and peoples. The assessment currently does a poor job of reflecting the importance of salmon and healthy salmon habitat to our communities, now and into the future.

After the needs for change are addressed by the USFS, there should be a way to ensure continued ongoing collaboration and relationship building. **We recommend providing opportunities for continued tribal collaboration** after the Tongass Forest Plan revision is complete. Every tribe with traditional lands within the Tongass National Forest should be offered a way to continue ongoing collaboration with USFS. Developing a committee, where a tribally appointed representative serves to assist with reviewing permits, ongoing proposals on projects within Tongass, and overall opportunity to provide insights and stewardship of traditional lands located within the Tongass Forest Plan, will allow for USFS to facilitate co-management and co-stewardship in practice. True co-management and co-stewardship practices are ongoing.

III. Specific Comments.

From *Gaanax*—to the Chilkat—our traditional migration routes, village locations, and harvesting locations, should be treated as sacred sites, protected from development, and without the ability of these lands to be sold, or transferred to state or private ownership. The USDA Forest Service must communicate with our Tribal government on all proposed actions within our traditional territory. In sacred places beyond our traditional territory, such as *Gaanax* and other landmarks and places along our migration paths, we would like to see these places protected from development and we would like to be informed on how we can protect our heritage as it relates to these places. This includes making sure that we are represented in all processes for the forest planning effort.

Our Tribal government should be involved in determining any specific “management units” to ensure that our traditional territories are reflected in these units. Specifically, the Tongass National Forest, as part of the final assessment, should include documented traditional territories for all Tribal governments in the Tongass. These traditional territory maps will illustrate the overlap of concerns and the importance of coordinating with all Tribal governments during the planning process. If a base layer map was created for the Tongass National Forest and published

publicly, and a Tribal traditional lands layers map was created, when projects are proposed in the Tongass, any USFS staff or contractors would know which direct tribes to consult for collaboration. We would like to ensure protection for Old-Growth forests. It is hard to find old-growth spruce and accessing traditional resources is an issue. We would like to ensure that we can access trees for carving, access important hunting areas, and places where mountain goats live. For the *Jilkáat* People, we had not only the scouts to Berners Bay from the Chilkat, but we also had camps throughout the region. At these camps, we harvested food, hunted, and fished. We don't get to do that anymore, just camping out somewhere on the land further out, getting a moose, and putting it up, we have been held in restraint by law, but we still see these places as harvesting areas. We would like to ensure our access to these places and work with the Forest Service to ensure that stewardship reflects our traditional values and that we are part of the decision-making process on all of these lands.

We would like the USFS to reconsider the definition of sacred places. Do not limit "cultural resources" to objects, rather, in your consultations and in your management plans, reflect our living culture. We rely on our relationship with land, and our traditional practices, to ensure our people continue to exist. Sacred is more than important. It is not a lie to say these are sacred places because this is the formation of our People, we are People of the Land, and it is in our name. We are connected to the land. We have traveled to each of these places on the Tongass to survive. We live among the land with all the other beings of the land. These places are sacred because even though we migrated from these places, it is in our DNA memory - the things we have eaten, the places we traveled, the places we have lived. The yakgwahéiyagu that exists in all of these places impacts all of us as Tlingit people. These places are all within the Tongass National Forest.

Our Tribal government has been deeply involved in sovereignty through governance. We request that any forest planning activities follow our Tribal constitution. To do this, the USDA FS must work with our Tribal government throughout the planning process. We can share our government's planning documents that follow the responsibilities for our government outlined in our Tribal Constitution. For example, we have a Climate Adaptation Plan which identifies concerns about climate change across the Tongass. Since 2022, our Tribal government has participated in the Kutí Project, a regional effort to identify Geohazards and help establish early warning systems for landslide events. The 1997 Tongass Land Management Plan does not address climate change concerns such as landslides, avalanches, and glacier retreats, and yet, these impacts and many more impact our Tribal citizens across the Tongass. The Drivers and Stressors of the Climate Change Final Assessment must reflect the work that has been done, on the ground and in the region, to identify and define both Indigenous Knowledge and Indigenous-led planning for climate change mitigation. Our Tribal government has established an Environmental Department-led Environmental Monitoring Program. We have Environmental Specialists who are training in water monitoring and geohazards monitoring, and our knowledge and concerns should be incorporated into the new Tongass planning process. We can provide important knowledge, by those who have lived here since time immemorial, on how to plan for the future.

Chilkat Indian Village (Klukwan), for example, has consulted with federal and state agencies for many years on the proposed Palmer Project, a proposed mine located in the headwaters of our

watershed, along the transboundary Chilkat and Klehini Rivers. The draft Tongass assessment makes little mention of the potential impacts of mining across Southeast Alaska, and yet, mining is one of the main industrial development activities expanding across the region, threatening our salmon and our ways of life. The final Tongass assessment must include detailed information about the impacts of mining already on the Tongass, and the potential for additional impacts. The Need for Change must reflect real strategies to minimize these impacts by allowing Indigenous Peoples to lead efforts to protect important salmon watersheds for our future, for the next seven generations, and beyond.

“Subsistence” is a legal term used to bind our traditions and cultures to the land on which we live, and the traditional lands we have stewarded since time immemorial. Though the draft assessment includes a thorough acknowledgment of these deep ties to the land in the “Tongass is an Indigenous Place” chapter, the Draft Subsistence Chapter does not include or rely on numerous additional resources that demonstrate how the plan revision process and updates to the forest plan could and should reflect a more comprehensive approach to Tribal engagement and co-stewardship in the management of subsistence resources. These are some specific recommendations for the Final Assessment:

- The Draft Subsistence Assessment should also be revised to include and assess additional relevant resources. For example, by leaving out pertinent and recently developed reports, the Draft Subsistence Assessment fails to appropriately acknowledge the deep and widespread criticism of subsistence management on the Tongass and throughout the federal public land system in Alaska. Though the Draft Subsistence Assessment includes a discussion of the complicated trade-offs and differences of opinion when it comes to managing different facets of subsistence on the Tongass—from timber harvest impacts to roads and road access—it does not offer any suggestion of a need to improve how that management is implemented based on existing critiques. While there may be “no one agreed-upon position by all users” on the particulars of subsistence management,^[1] there is broad-based dissatisfaction with the implementation of ANILCA’s Title VIII. Many of the resources described in this section offer detailed and well-informed critiques of the existing state of subsistence management. Other resources demonstrate the momentum of current trends toward expanded tribal co-stewardship. All of these resources would therefore enhance the information on which the Draft Subsistence Assessment relies, thereby improving and strengthening its conclusions.
- Most critically, the Draft Subsistence Assessment appears to ignore a significant amount of work done by both the USDA and the Department of the Interior to gather feedback and assess the United States’ efforts to fulfill Title VIII’s mandate. The *Federal Subsistence Policy Consultation Summary Report*, issued on June 14, 2022, integrates feedback from roughly 445 individual subsistence users and representatives from Alaska Native Villages, Tribal Consortia, Alaska Native Organizations, and Alaska Native Corporations who participated in the listening sessions and consultations in January 2022.^[2]
- Several drivers and stressors reviewed in the Draft Subsistence Assessment also emerged as dominant themes in these consultation sessions. However, one overarching theme

evident in the sessions—but not detailed in the Draft Subsistence Assessment—is a demand to have “more meaningful involvement” by Alaska Native Tribes in the subsistence decision-making process.^[3] Those participating in these sessions suggested several different ways of doing so, from expanding tribal co-stewardship of the Tongass to working more closely with the Southeast Alaska Regional Advisory Council (SEARAC). Notably, although these sessions resulted in changes to the composition of the Federal Subsistence Board (FSB) that added three public members nominated or recommended by federally recognized Tribal governments^[4] and reorganized the administrative structure of the Office of Subsistence Management (OSM),^[5] the Draft Subsistence Assessment failed to consider the extensive input received by USDA during those consultations.

- Another important source of information not incorporated into the Draft Subsistence Assessment is the 2020 Inter-Tribal Administrative Procedure Act Petition “To Create a Traditional Homelands Conservation Rule for the Long-term Management and Protection of Traditional and Customary Use Areas in the Tongass National Forest.”^[6] Though discussed in the Tongass as an Indigenous Place,^[7] it is not referenced in the Draft Subsistence Assessment. The Traditional Homelands Petition provides a vision and set of principles rooted in tribal interests and according to which the Tongass could be managed in the future, with several recommendations for subsistence management.^[8]

Though not a “land use plan” per se, the Petition offers a vision and framework for land management that could be “coordinated” with the Tongass Plan revision, as required in the NFMA planning regulations.^[9] The Petition highlights several criticisms of how Title VIII, and §810 in particular, is being implemented—or not implemented at all—by the USFS. The Petition also provides feasible steps that could be taken to fix these problems, all of which rely upon existing tools and legal authorities. The Petition’s signatory Tribes expressed deep dissatisfaction with subsistence and other decision-making processes used by the USFS. If a federal rulemaking is not forthcoming in response to the Petition, it provides an important basis on which the Draft Subsistence Assessment could, as Secretary of Agriculture Thomas Vilsack suggested, ensure that the USFS “fulfill the [P]etition’s intent through forest planning, consultation, co-stewardship, and decision-making at the local level.”^[10]

IV. Conclusion.

The Assessment phase of forest planning is only the first step in the revision process, and we understand that there is much more to come. We look forward to partnering with the Forest Service to integrate our expertise, experience, and knowledge into this, and future, forest plan revision phases. The Tribal assessment is a good start for the Forest Service’s understanding of our long history and use of this area, and our relationships with all the beings that depend on it. Furthermore, we still believe that the forest plan can integrate and build on the variety of

successful examples of co-stewardship and co-management that are already happening on the Tongass, throughout Alaska, and throughout other parts of the United States.

These models demonstrate the tremendous potential for co-stewardship across a range of issues facing our forest lands. Co-stewardship in the Tongass presents exciting possibilities that can bolster our communities, our economies, and the health of our landscapes. The Forest Service must continue to build its relationship with the sovereign Tribes of the Tongass, as we work together to ensure the long-term health and sustainability of this valuable ecosystem. We would appreciate creating a path forward on this together.

We look forward to continued collaboration on this moving forward. For any further questions or concerns, please direct all correspondence to klukwan@chilkat-nsn.gov.

Gunalchéesh,



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[1] U.S. Forest Service, Subsistence Assessment, at 16.

[2] U.S. Department of Interior and U.S. Department of Agriculture, *Federal Subsistence Policy Consultation Summary Report* (June 14, 2022).

[3] *Id.*, at 6.

[4] 89 Fed. Reg. 83,622 (Oct. 17, 2024)

[5] See Secretarial Order 3413, *Transfer of the Office of Subsistence Management to the Office of the Secretary* (June 27, 2024).

[6] Organized Village of Kasaan, Organized Village of Kake, Klawock Cooperative Association, Hoonah Indian Association, Ketchikan Indian Community, Skagway Traditional Council, Organized Village of Saxman, Yakutat Tlingit Tribe, Central Council Tlingit and Haida Indian Tribes of Alaska, *Petition for USDA Rulemaking to Create a Traditional Homelands Conservation Rule for the Long-Term Management and Protection of Traditional and Customary Use Areas in the Tongass National Forest* (July 16, 2020) [hereinafter *Traditional Homelands Rule Petition*].

[7] *Tongass as an Indigenous Place*, at 51.

[8] *Traditional Homelands Rule Petition*, at 7.

[9] *See* 36 C.F.R. §219.4(b) (“The responsible official shall coordinate land management planning with the equivalent and related planning efforts of federally recognized Indian Tribes, Alaska Native Corporations, other Federal agencies, and State and local governments.”)

[10] Thomas Vilsack, Secretary U.S. Department of Agriculture, Response to Tribal Leaders for Petition to Create a Traditional Homelands Conservation Rule (Aug. 9, 2023).