

Data Submitted (UTC 11): 11/27/2019 9:00:00 AM
First name: Dawn
Last name: Jackson
Organization: Organized Village of Kake
Title:
Comments: Request for extension of Comment period

Please find attached letter.

Gunalcheesh,

Dawn Khaaxw[acute]an Jackson

Executive Director

Organized Village of Kake

Core Purpose: Strengthen Tribal Community and Culture

Core Values: Respect, Collaboration, Endurance, Safety and Security

The following text was copy/pasted from an attached letter. The system cannot display the formatting, graphics, or tables from the attached original.

Troy D. Heithecker

Acting Forest Supervisor
Tongass National Forest
Ketchikan, Alaska 99901
Troy.d.heithecker@usda.gov

Extension request for commenting on the Alaska Roadless Rule Draft Environmental Impact Statement

Dear Acting Forest Supervisor Heithecker,

The Organized Village of Kake would like to submit an official request you extend the comment period on the Alaska Roadless Rule Draft Environmental Impact Statement (DEIS) for an additional 90 days. Due to weather delays and poor planning, the Organized Village of Kake and the broader community is at an unacceptable disadvantage for learning about the effects of the proposed full exemption and the rulemaking process, and now has an extremely limited amount of time to comment on the project after the public meeting and subsistence hearing. Comments on the Alaska Roadless Rule DEIS are due December 17, 2019. The proposed public

meeting for Kake is on December 7, 2019. Ten days is a completely insufficient amount of time for the Forest Service to educate our community citizens, tribal council, tribal citizens, and city government, and for us fully deliberate on the most appropriate response and contribute thoughtful, effective comments.

The Forest Service was originally scheduled to host a public meeting and subsistence hearing in Kake on November 8th, 2019. OVK got notice that this meeting was cancelled on the morning of November 7, 2019. The Forest Service then rescheduled the meeting for November 22nd, 2019. This meeting was also cancelled due to weather, and OVK received notice on the morning of November 21, 2019. The Forest Service has now rescheduled the public meeting and subsistence hearing on December 7, 2019, to accommodate for OVK's participation in the BIA conference in Anchorage during the first week of December. However, the late date of this meeting, now December 7th, and the potential for it to be further rescheduled due to weather puts our tribal council, tribal citizens, and the entire community of Kake at a crucial disadvantage during this rulemaking process and thus hinders everyone's ability to effectively participate in the rulemaking process.

The Organized Village of Kake, our tribal citizens, and our community are at the frontlines of this issue and will be the most directly impacted by any exemption from the current protections provided for by the 2001 Roadless Rule or failure to improve the rule by including roughly 350,000 acres that were wrongly excluded from the inventory used to support the 2001 Rule. These excluded roadless areas include customarily and traditionally important lands in the East Kuiu (VCUs 4160, 4170, 4180) and Three mile Arm (VCU 4190). Therefore, it is critical that the Forest Service make every effort to come to the community of Kake and educate our Tribe and community citizens on the potential effects of this rulemaking process. However, we do not believe that every effort has been made. Not once before the other two cancelled meetings were precautions taken to arrive early or in a different mode of transportation (boat, ferry, floatplane) in order to ensure that the meeting would occur, despite the Forest Service being well aware of the dynamic weather of Southeast Alaska and the challenges it poses for travel, especially during the winter season.

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Obviously, the Alaskans most directly affected by this proposal are at the height of our busy festive seasons, which are full of potlatches, community gatherings, cultural events, and seasonal markets. Furthermore, OVK's input on the rulemaking process has already been hindered due to the agency's strict, politically driven timeline for input. There was inadequate time for tribes to review draft documents, which consisted of hundreds of pages of draft language and maps. The tribal governments of Southeast Alaska are small organizations with minimal work staff. The Organized Village of Kake, which participated as a cooperating agency in the process, received only nine days to review and comment on the preliminary DEIS that was more than 500 pages in length. This particular comment period occurred last February, while the Tribe was feeling the effects of the government shutdown and heavily reduced funding for tribal government operations, in addition to multiple deadlines to meet during the spring and summer months. Together, these constituted a great burden for OVK because tribal citizens had to take time away from their subsistence activities to participate in cooperating agency meetings, and because we had to use our own scarce resources to support our staff in meeting the comment deadline. As you are aware, OVK and other tribal cooperating agencies did not receive a \$2 million grant from the Forest Service to participate as cooperating agencies in this process, unlike the State of Alaska.

We appreciate the efforts of the Forest Service to schedule these meetings at a time when the majority of tribal citizens and OVK's tribal council will be present for them. However, we do not believe that we should be put at a disadvantage due to previously scheduled commitments (such as the BIA conference in Anchorage during the first week of December) that our Tribe depends on to learn how to enhance the services that we provide for our citizens. The Forest Service scheduled the public meeting in Kake to occur three weeks into the start of the comment period. Weather in southeast Alaska during the winter months is well-known to be extremely unpredictable and hard to travel in, and we believe that the Forest Service should have anticipated this and planned for an extended comment period from the beginning, as per our other extension requests.

Many Southeast Alaska communities have a majority minority population. Communities in this region are predominantly rural, and we retain subsistence lifestyles in a mixed, subsistence/cash-income economy. Our continued traditional and cultural uses of the lands and waters contribute to the physical and spiritual well[shy]being of our people and communities and help to maintain a close relationship to the land and our kinship ties. As Alaska Natives, we depend on the integrity of the forest and the streams now more than ever for cultural integrity than

For all these reasons, we are asking you to grant an extension of the review period for the ROADLESS RULE DEIS for another 45 days. Your favorable response would be a practicable means for the agency to encourage and facilitate public involvement in agency management of the Tongass National Forest, America's biggest, wettest, and wildest national forest. Thank you for your expeditious response to our request.

Gunalcheesh,

Joel Jackson
President

[Position]