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First name: Jeanette
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Organization: Angoon Cooperative Association
Title: President
Comments: Dear Honorable Secretary Perdue,

Since time immemorial, we, the indigenous peoples of Southeast Alaska, have enjoyed an intimate connection with Haa Aani (Our Land). The land and waters of our homelands are integral to, and inseparable from, our culture, community vibrancy, rural subsistence lifestyles, and economic opportunity. The signatory tribes have their roots in the Tongass National Forest and have defended the integrity of their indigenous habitat from the destructive forces of colonization since the arrival of the "dleit kaa" to our lands several hundred years ago.

The granting of the State of Alaska's petition for an Alaskan exemption to the 2001 National Roadless Conservation Rule on the Tongass in 2018, without consulting any affected Native peoples, represents the most controversial and potentially destructive assault on our way of life to date. It was clear from the outset, that an Alaska Specific Roadless Rule would not leave current roadless protections in place - roadless protections were going to be stripped from the lands we have called home since time immemorial.

In our opinion, our ability to influence the "proposed" roadless rulemaking was going to be through acceptance of the Forest Service's belated offer to participate as "cooperating agencies" during the ongoing National Environmental Policy Act (NEPA) review process. As cooperating agencies, we had hoped our involvement in the early formulation of the alternatives and advocacy for alternatives most suitable to our communities would help to mitigate the worst of the potential impacts to our communities. We knew our voice would not be heard if we were not at the table, thus in good faith, we entered the process as a "cooperating agency".

We are profoundly disappointed with the manner the roadless rule exemption process been handled, especially as regards the federally recognized tribes that involved themselves as "cooperating agencies". It is our opinion that the lead agency has not honored their responsibility

to cooperating agencies. Specifically, we point to two sections of the main steps of the NEPA process (40 CFR [sect] 1501.6 - Cooperating agencies. [sect] 1501.6 Cooperating agencies) which we do not feel have been met:

[bull] "(2) Use the environmental analysis and proposals of cooperating agencies with jurisdiction by law or special expertise, to the maximum extent possible consistent with its responsibility as lead agency."

[bull] "(3) Meet with a cooperating agency at the latter's request."

The U.S. Forest Service plowed recklessly ahead at a frantic pace to satisfy a predetermined timeline. The arbitrary two-week deadline given for cooperating agencies to review and comment on the Preliminmy Draft Environmental Impact Statement (DEIS) was insufficient for us to solicit insights fully from our respective Tribal Councils into the far-reaching implications of this controversial rulemaking. Additionally, the USFS declined to address all of the substantive concerns raised by cooperating agency Tribes on the Preliminary DEIS, including updating community use areas to reflect traditional territories/uses accurately or consider alternatives that provide co-management authority for Tribes concerning all activities within inventoried roadless areas located inside a Tribe's traditional territory.

As the rulemaking process advanced, it become apparent that stakeholders, such as the federally recognized tribes, calling for maintenance of the roadless protections and/or very limited changes to the current protections, were at odds with the alternative preferred by the decision makers at the Federal and State level. All of the Tribes on this unified letter have supported the "no and/or limited modification" alternatives since inception. That position is well documented on the record. We believe this position has made the "cooperating agency" Tribes a nuisance factor to be ignored.

Recently revelations widely reported in the media that a full-exemption of the 2001 Roadless Rule may become the preferred alternative have confirmed our worst fears - the feedback of Tribes, consensus of all Alaskans, and majority of public comments received during the public scoping

process were disregarded in their entirety. Blatant disregard for any of the needs of the Cooperating Agency Tribes disregards the mandates of the NEPA process. The only voice being used "to the maximum extent possible" is the voice of industry and lobbyists looking to maximize the short-term gains of extraction industries in the Tongass National Forest.

Although it should be unnecessary to say, we say it again : inventoried roadless areas conserve natural diversity, serve as a bulwark against the spread of invasive species, protect healthy watersheds, provide climate change resilience, and help ensure the continued protection of indigenous fish and wildlife that Native communities rely on for subsistence food and cultural identity. Full exemption violates the intent of the rule and does not conserve roadless area characteristics, conserve socio-economic well-being, or conserve habitat.

Unlike current administrations at the State and Federal level, we acknowledge that compromise is necessary. Our position compromises between our values and State and Federal desires; it is not unreasonable.

We are asking in a unified voice as Cooperating Agency Tribes that you "use the environmental analysis and proposals of cooperating agencies" to the maximum extent possible. It is our expectation the lead agency will take this matter seriously, and the failure to do so will prove to us beyond a doubt that our voice and the time it implies have no use in this process. It would force us to disavow a broken process and Tribes that joined as "cooperating agencies" will need to determine what their future involvement will be given what seems an inevitable, pre-determined decision that is at odds with the values held for our culture, our citizens, and our environment.

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