

Data Submitted (UTC 11): 4/12/2022 11:11:17 PM

First name: Adam

Last name: Kersch

Organization: Sealaska Heritage Institute

Title: Culture and History Manager

Comments: To:

Brian Pentecost,

District Ranger

Craig Ranger District

Tongass National Forest

I am the Culture & History Manager at Sealaska Heritage Institute responding to a Section 106 comment request.

In a survey of the possessory and aboriginal rights of Tlingit and Haida people in Southeast Alaska, Dr. Walter Goldschmidt and Theodore Haas found "strong evidence that the [Taant'a K_wáan] people of Ketchikan occupied Moira Sound and that their rights in these waters extend from early times" (1998, 85). At the time of this 1946 study, George Kegan claimed Kegan Cove and the entirety of Moira Sound and owned multiple smokehouses in the area. This information was corroborated from multiple witnesses: Joseph Johns, Herbert J. Burton, and George Kegan Williams. Likewise, this study found that Haida people from Kasaan regularly hunt, trap, and fish in Moira Sound.

Although the proposed project is excluded from documentation in an environmental impact statement or environmental assessment under NEPA as it has been deemed to "not individually or cumulatively have significant effect on the quality of the human environment," the planners of this project must understand that the proposed activities could have a severe and significant impact upon local wildlife, some of which may be crucial sources of nutrition. Notably, any impact on this wildlife may carry different moral and ethical connotations to many Tlingit and Haida people than it does for non-Indigenous peoples. As a result, the Forest Service must consider that any harm to non-human animals from mining activities could contribute to and exacerbate intergenerational trauma and food insecurity related to settler colonialism and the impacts that such industries have already had on Tlingit and Haida people in the area.

I would not feel comfortable with this project continuing without explicit permission from the descendants or relatives of George Kegan, who may be able to comment on the existence of important cultural sites. The above-mentioned study noted that the Raven people of Ketchikan were the rightful owners of this place. Consequently, they must be consulted before this proposal can continue.

Please feel free to reach out to me if you have any questions or concerns.

Thank you,

Adam Kersch

Culture and History Manager

Sealaska Heritage Institute