



**Organized Village of Kake**

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**(Federally Recognized Tribal Government serving the Kake, Alaska area)**

January 31, 2019

David Schmid  
Regional Forester  
U.S. Forest Service  
Alaska Region  
709 West 9th Street  
Juneau, AK 99801  
(907) 586-8775  
[David.schmid@fs.fed.us](mailto:David.schmid@fs.fed.us)

RE: Timeline for Alaska Roadless Rule Process

Dear Mr. Schmid,

The Organized Village of Kake (OVK), a cooperating agency in the Alaska Roadless Rule process, would like to formally object to the pace at which Alaska Roadless Rule Process is being pursued and advocate for a delay in the proposed timeline to allow for a more thorough analysis of the concerns identified in the scoping process. OVK does not believe that it is possible to sufficiently analyze the issues inherent in the creation of an Alaska-specific Roadless Rule in a four-month period which includes a 35-day government shutdown that affected not only agency staff, but tribal entities in Alaska which had their operations severely impacted by the shutdown. We request that the U.S. Forest Service delay the extremely expedited timeline with which they have been pursuing the creation of the Alaska Roadless Rule, and create a timeline that is more appropriate to analyze the complex issues and concerns brought forth by the federally-recognized sovereign nations and communities in Southeast Alaska.

The Tongass is the largest National Forest and contains the most Inventoried Roadless Area acreage in the nation. It has historically been subject to extreme controversy as the U.S. Forest Service was overwhelming focused on supplying pulp and timber mills with Tongass timber, while trampling and ignoring the rights and concerns of the Native Alaskans who have lived in this place since time immemorial. In Kake, we have endured the pillaging of our land for the profits of overseas corporations at the economic, environmental, cultural, and social expense of our people for over 50 years. Now, the U.S. Forest Service is rushing through a process that could significantly alter the ecological integrity of the land and watersheds that we depend on for our cultural traditions, our food security, and our economic livelihoods.

Idaho filed a petition for a state-specific rule on October 5th, 2006; the DEIS for the Idaho rule was released on December 21th, 2007 – over a year after the original petition had been filed. The final rule was not codified into law until October 16th, 2008 – over two years after the process began. Colorado filed a petition for a state-specific rule on November 13th, 2006; their DEIS was a year and a half later, on July 25th, 2008. Their final rule took effect four years later, in 2012. Both states contain less Inventoried Roadless acreage than the Tongass, and their national forests are substantially less controversial, at least on a national level. It is ludicrous to assume that the complex issues that characterize the Tongass, which contains the most Inventoried Roadless Acreage and the health and future of which is critical to the thirty-two communities that live within it, can be sufficiently analyzed and satisfactorily addressed in a DEIS conducted in just three and a half months.

This time period is especially insufficient since the government has been shut down for 35 days during this aforementioned period, during which the Alaska Roadless Rule team was not operating at full capacity. Furthermore, OVK was also affected by this shutdown, as 98% of our funding comes from the federal government. The result of this funding lapse has made it extremely difficult to provide services to our tribal citizens, as well as do the necessary preparation for us to be able to assess the impact of the draft environmental impact statement on our island and locations of community use.

For OVK, cooperating agency status is meant to build relationships of trust and cooperation between the Forest Service and us, as well as facilitating the use of our local knowledge of economic, environmental, and social conditions. Thus, we request that the Forest Service do their due diligence in making wide-ranging decisions for this Forest by taking the time to consider the concerns of OVK with the pace of this process and reducing the pace accordingly. We would like to see an extended deadline of at least two months for reviewing and commenting on the draft environmental impact statement that we are expecting to see on February 14th, 2019. We are overwhelmed by the two-week deadline for us to analyze this complex document and its undoubtedly wide-ranging effects. We request a justification for the Forest Service's imposition of a seemingly arbitrary and insensitive deadline on a project with such controversial and far-reaching implications. We also request a full report on the scoping comments received by the agency with an attached analysis of the number of comments made in support of/in opposition against changes to the Roadless Rule. Furthermore, so that we may appropriately plan for the year ahead, we request a detailed timeline of future actions that are in planning, especially those done in conjunction with and necessitating the support of the cooperating agencies. We require a timeline to plan for these expedited requests of analysis and feedback on critical project documents, so that we may solicit insights from our Tribal Council regarding this extensive rulemaking process and its effects.

We appreciate our involvement in this process and look forward to your timely response.

Gunalcheesh,

A handwritten signature in blue ink that reads "Joel Jackson pres".

Joel Jackson  
President

Cc: Ken Tu  
Cooperating Agencies