

Chilkoot Indian Association, Craig Tribal Association, Douglas Indian Association, Hoonah Indian Association, Ketchikan Indian Community, Klawock Cooperative Association, Metlakatla Indian Community, Organized Village of Kake, Organized Village of Kasaan, Petersburg Indian Association, Skagway Traditional Council, Central Council of Tlingit & Haida Indian Tribes of Alaska

SUBMITTED VIA FEDERAL REGISTER DOCKET & ELECTRONIC SUBMISSION

Attn: Roadless Rule EIS Comments
Director, Ecosystem Management Coordination
United States Forest Service
201 14th Street SW, Mailstop 1108,
Washington, DC 20250-1124

RE: Technical Comments on the Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS) for the Proposed Rescission of the 2001 Roadless Rule Reinstatement – Tongass National Forest

Dear Secretary Rollins and Forest Service Planning Staff:

The undersigned Southeast Alaska Tribal Governments, as federally recognized sovereign nations whose ancestral homelands encompass what is now known as the Tongass National Forest, respectfully submit the following technical comments on the Notice of Intent (NOI) issued by the U.S. Department of Agriculture (USDA) to develop an Environmental Impact Statement (EIS) concerning the proposed rescission of the 2001 Roadless Area Conservation Rule (2001 Roadless Rule) as applied to the Tongass National Forest.

For the Tribes of the Tongass, these forests are not merely resources—they are our homelands. Our communities rely on them for cultural, nutritional, spiritual, and economic sustenance. Accordingly, any federal proposal that alters the management regime of these lands, particularly one involving the potential expansion of industrial-scale development into currently protected areas, constitutes a matter of significant tribal concern. We therefore offer the following comments in three primary domains:

- I. Priority Considerations and Alternatives to the Proposed Recission of the 2001 Roadless Rule**
- II. Effects That Should Be Analyzed in the EIS and Relevant Scientific Studies, Indigenous Knowledge, and Local Data Legal and Procedural Concerns Affecting Tribal Rights and Interests**
- III. Legal and Procedural Concerns Affecting Tribal Rights and Interests**

I. Priority Considerations and Alternatives to the Proposed Recission of the 2001 Roadless Rule

A central shortcoming of the NOI is its apparent framing of management options through a limited and binary lens—one that positions the complete rescission of the 2001 Roadless Rule as necessary to facilitate economic vitality and the development of a sustainable forest-based economy within the Tongass National Forest (Green, 2007; Trump, 2025). Such framing fails to reflect the range of scientifically and culturally grounded management strategies that have emerged from decades of tribal, regional, and intergovernmental planning efforts (Organized Village of Kasaan et al., 2020; Portner, 2021; Sustainable Southeast Partnership, 2020). Additionally, the continued reliance on timber-volume mapping as the primary means of measuring forest diversity, ecosystem function, conservation priorities, and potential effects is fundamentally flawed. Accordingly, the following alternatives and priority issues must be fully developed, considered, and analyzed within the EIS process:

Priority Consideration

A. Transition to Culturally Aligned Young-Growth Forestry in Previously Logged Areas

- Focus considerations on restoration-based second-growth timber harvest within the existing road matrix (Hanley, 2005; Sustainable Southeast Partnership, 2020).
- Avoid expansion into roadless or unfragmented old-growth areas (Carroll et al., 2025; DellaSala et al., 2022; Martin et al., 2021).
- Implement Indigenous Knowledge and science-based restoration forestry to improve habitat quality and connectivity, and understory diversity (Garibaldi & Turner, 2004; Kübler & Günter, 2024; Lee et al., 2021; Long et al., 2020; Wickham et al., 2022).
- Support the continued work of regional working groups (Southeast Alaska Sustainability Strategy, Tongass Transition Collaborative) whose efforts have resulted in planning frameworks that have garnered community support (Portner, 2021).

B. Investment in Deferred Maintenance and Existing Infrastructure to Support Regional Economic Objectives

- Allocate funding toward backlogged maintenance of existing forest roads, culverts, and bridges, particularly for fish passage and erosion control, and towards the development of durable, culturally aligned young growth active management. Currently, there are approximately 5,000 miles of roads within the National Forest system, approximately 3,100 miles of which are not maintained for passenger vehicles (Escamilla, 2024) and a \$10.8 billion dollar backlog in deferred maintenance costs.

- Develop funding strategies, allocations, and mechanisms that do not rely on the sale of timber to maintain infrastructure maintenance and invest in restoration.
- Prioritize contracting for upgrades using Good Neighbor Authorities with southeast Alaska Native Tribes, 638 contracting and compacting mechanisms, and the Tribal Forest Protection Act to ensure tribal involvement in project development, oversight, and implementation.

C. Indigenous-Led Forest Stewardship

- Establish a co-management framework in which federally recognized tribes assume lead roles in determining local land use designations, consistent with principles of Indigenous self-determination (Johnson et al., 2021; Mills & Nie, 2021, 2022).
- Embed Indigenous Knowledge and cultural-use mapping in the development of adaptive management zones and protected areas (Berkes et al., 2000; Blevins, 2024; Cuerrier et al., n.d.; Fatorić & Seekamp, 2017; Johnson et al., 2021; Lander & Mallory, 2021).

These priorities reflect our traditional cultural values, ecological imperatives, and durable regional consensus on economic trajectories that should be given full analytical weight in the scoping and subsequent NEPA phases of this rulemaking.

Alternatives to the Proposed Rescission of the 2001 Roadless Area Conservation Rule

Tribal Alternative for the Protection of Traditional Homelands In the Tongass National Forest

Overview

In recognition of the inherent sovereignty and government-to-government relationship between federally recognized Tribes and the United States, and in light of the longstanding, well-documented traditional and customary uses of the Tongass National Forest by the indigenous peoples, we propose the development and adoption of a Tribal Alternative as part of the Environmental Impact Statement (EIS) process for the proposed rescission of the 2001 Roadless Rule. This alternative is rooted in the protection of tribal homelands, cultural lifeways, and ecological stewardship responsibilities.

Purpose and Need

One of our sovereign Tribes' highest priorities is the protection and continuation of traditional and customary hunting, fishing, and gathering practices within our traditional tribal territories. These lifeways are directly threatened when large-scale industrial activities—such as road construction, logging, mining, and mineral leasing—are allowed

to further degrade the lands and waters of the Tongass, especially without the informed consent or full participation of affected Tribes.

Despite participating in consultations and serving as cooperating agencies during the Alaska Roadless Rulemaking processes, our sovereign input has been repeatedly ignored or marginalized (Organized Village of Kasaan et al., 2020). This failure amounts to collective disenfranchisement and undermines the federal government's trust responsibility and its obligations under Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments), among others.

Core Components of the Tribal Alternative

1. Creation of a Traditional Homelands Conservation Rule

The USDA and U.S. Forest Service (USFS), in partnership with the sovereign Tribal governments of Southeast Alaska, shall initiate an independent rulemaking process to establish a Traditional Homelands Conservation Rule that is:

- Separate from the Alaska Roadless Rule and any current or future efforts to modify or rescind the 2001 Roadless Rule.
- Centered on protection of areas identified as critical to traditional and customary tribal use.
- Structured around co-management principles that fully integrate Tribal ecological knowledge, cultural priorities, and land stewardship values.

2. Identification and Mapping of Traditional and Customary Use Areas

This process shall include:

- Development of a transparent and culturally appropriate methodology for the identification, documentation, and protection of traditional and customary use areas.
- Direct participation of Tribal knowledge-holders and governments in the designation of these areas.
- Ensuring that identified areas are permanently protected from industrial-scale logging, roadbuilding, mining, and other extractive practices.

3. Implementation of Forest-Wide Conservation Measures

- Prohibit large-scale industrial development in identified traditional and customary use areas.
- Maintain and expand roadless protections within the Tongass National Forest in areas of Tribal significance.
- Promote restoration of previously impacted sites in partnership with Tribal governments, utilizing Indigenous stewardship principles.

4. Government-to-Government Consultation and Mutual Concurrence

- Enforce the established formal government-to-government consultation framework based on mutual concurrence, ensuring that no major decision affecting traditional lands proceeds without the informed agreement of affected Tribes.

5. Utilization of Existing Authorities and Cooperative Agreements

- Expand the use of stewardship contracting, cooperative agreements, and other authorities to empower Tribal co-management of lands and resources.
- Fund Tribal natural resource departments to carry out ecological monitoring, cultural site management, and sustainable development planning.
- Authorize tribes to assume the development of the environmental impact statement for the Tongass National Forest Plan Revision and associated NEPA processes with predicted impacts to homeland forests.

6. Cultural and Environmental Justice Protections

- Recognize and address the disproportionate impacts of environmental degradation on Alaska Native communities.
- Embed principles of Tribal cultural continuity, ways of life, and subsistence rights into all planning and decision-making related to the Tongass.

Conclusion

The Tribal Alternative represents a path forward that honors the sovereignty, culture, and deep ecological knowledge of the Indigenous peoples of Southeast Alaska. It seeks to ensure that any changes to federal land management policies in the Tongass do not replicate the historic injustices of exclusion, exploitation, and environmental harm. We call on the USDA and USFS to adopt this alternative in good faith, and to begin a new chapter of respectful, collaborative, and government-to-government partnership in the stewardship of our shared forest homeland.

Additional Proposed Alternatives and Considerations

The ultimate test of any policy is its durability. While this NOI requests input on national alternatives, one of the primary justifications for the proposed rescission is the desire for decision-making power to be placed in the hands of regions and communities. On this front, the Idaho Roadless Rule has proven remarkably successful. Following its promulgation, the rule was challenged in federal court by a coalition of conservation groups who argued that it illegally weakened the protections of the 2001 rule and failed to comply with environmental laws. These groups pointed to Forest Service projections that the Idaho rule would triple road construction and nearly double logging compared to the 2001 rule.

Despite these objections, the rule was upheld first by the U.S. District Court for Idaho and then, in 2013, by a unanimous (3-0) decision from the Ninth Circuit Court of Appeals. This legal validation, from a court often seen as environmentally leaning, is a powerful testament to the rule's sound legal and procedural construction.

Politically, the rule has been equally resilient. Because it was forged through a state-led, collaborative process with broad stakeholder and tribal buy-in, it has not faced the persistent threats of administrative reversal that have plagued the national rule. Idaho Senator Jim Risch continues to champion it as a successful, common-sense model that other states should emulate to resolve their own public land disputes.

The Idaho rule's success demonstrates a critical principle: by localizing the decision-making process, as this proposal claims it wants to do, it transforms the debate from a national, ideological conflict to a series of local, community-based and science-based evaluations. The Idaho rule itself does not authorize a single project; it establishes a rigorous but workable framework for evaluating projects that would have been non-starters under the 2001 rule, including all of the fire management issues the Administration now claims are necessary to address with the current proposal.

Still, more than 95% of the roadless acres under the Idaho Roadless Rule enjoy similar or stronger protections than under the 2001 national rule while still providing the management flexibility this Administration claims to want. This shift in the locus of conflict resolution is perhaps its most important and replicable feature, and it should get serious consideration here with this current proposal. If this Administration truly believes in solutions for our National Forests, its preservation of the Idaho Roadless Rule is definitive as to what does, and does not, work on our public lands.

A Tribal and State co-led process could have equally similar successful results for all parties involved as the Idaho Roadless Rule. Failure to consider an "Idaho Rule"-like solution for the Tongass would be a grave violation of the APA, NEPA and common sense. Doing so would be a triumph of this Administration's wisdom.

Per the extensive tribal and community engagement during the 2020 Alaska rulemaking process, which advocated for "long-term, durable approach to roadless areas management...that accommodates the unique biological, social, and economic situation found in and around the Tongass". We submit the proposed alternatives taken verbatim from the Alaska Roadless Rulemaking Regulatory Impacts Assessment and Cost Benefit Assessment (2020) for consideration. The proposed alternatives reflect the results of extensive public engagement and alternative building work that took place during the development of the Alaska Roadless Rule. While these alternatives are specific to Alaska, we submit them as durable, community-developed alternatives that can be scaled up to accommodate the multiple uses under which National Forests are managed or reconsidered as components of an updating of the 2020 Alaska Roadless Rule under one of the community-supported alternatives which would advance national strategy.

Alternative 1 (Southeast Tribes Alternate Priority)

Maintain and strengthen the 2001 Roadless Rule (No Action Alternative)

- Retain all current protections for inventoried roadless areas (IRAs) in the Tongass.
- Strengthen conservation provisions by identifying ecologically critical and culturally significant subunits (e.g., karst, high-volume stands, cultural and sacred sites) for enhanced protection (Betts et al., 2018; Birdsey et al., 2025; Carroll et al., 2025; DellaSala et al., 2022).

Alternative 2 (Watershed Priority)

Alternative 2 maximizes roadless area protection, by adding an additional 133,000 acres as Alaska Roadless Areas, while providing for additional timber harvest opportunities by removing areas generally known as “roaded roadless” areas but also include additional areas considered to be substantially altered. Alternative 3 provides more timber harvest opportunities than Alternative 2 by removing substantially-altered roadless areas (including roaded roadless, similar to Alternative 2) and extending the bounds of these areas to logical end points of existing road and timber harvest systems (212,000 acres), generally defined as the nearest watershed boundary (i.e., ridgeline of 14th-field hydrologic unit) from an existing road system. Removing these areas from the roadless inventory represents the logical extensions of substantially altered acres from existing infrastructure and likely encompasses the more economically feasible locations for future timber harvest with the least impact to roadless characteristics.

Alternative 3 (Community Priority + Watershed Priority)*

Alternative 3 also provides additional timber harvest opportunity by designation of Community Priority areas around affected communities. Community Priority areas allow for small-scale timber harvest and associated road construction and reconstruction.

*This management category was developed to address specific desires of some communities to retain roadless protections while also allowing for small timber operators in the community, infrastructure development to support the communities, and provide for traditional Alaska Native cultural uses. The provision allows for road building to accommodate small commercial sale less than one million board feet (which does not exclude larger operators but designed to reduce barriers to entry for smaller operators). The Forest Service is seeking public input on this management category, specifically with respect to whether this designation should be applied to other communities/areas. The Forest Service proposes to consider applying the Community Priority land management category to ARAs either adjacent to communities or within Community Priority areas as requested by non-profit community associations organized under State of Alaska law (Alaska Statute 10.20.005), municipal governments, or tribal governments.

II. Effects That Should Be Analyzed in the EIS and Relevant Scientific Studies, Indigenous Knowledge, and Local Data

Any serious examination of the implications of rescinding the 2001 Roadless Rule must include comprehensive and interdisciplinary analyses of cumulative, long-term, and place-based effects. The following categories of impacts are of relevance:

A. Impacts to Alaska Native Ways of Life and Subsistence Resources

- Diminished access to and availability of subsistence resources such as Sitka black-tailed deer, anadromous fish, berries, and food, fiber, and medicinal plants

due to habitat fragmentation, loss of old-growth, and the degradation of productive understory (Buonanduci et al., 2025; Johnson et al., 2021; Long et al., 2020; Shanley et al., 2021; Ulaski et al., 2025).

- Disruption of spiritual and ceremonial use areas embedded in intact forest landscapes (Dixon et al., 1997; Freedman & Fridgen, 2007; Isa, 2018).
- Declining intergenerational transmission of traditional knowledge due to ecological degradation of culturally vital gathering and hunting grounds and associated learning opportunities (Bussey et al., 2016; Chamley et al., 2008; Charnley et al., 2007; Cheveau et al., 2008; Huntington, 2000; Kimmerer, 2002; Todd et al., 2023).

Federal law (Section 810 of ANILCA) requires that federal agencies specifically consider these impacts. See 16 U.S.C. § 3120(a). Thus, as in the promulgation of Alaska-specific roadless rules in 2020 and 2023, the USDA must conduct such analysis, as noted below.

B. Biodiversity, Wildlife, and Forest Integrity

- Loss of contiguous habitat for endemic, threatened, and culturally critical wildlife species, including but not limited to the Chinook, Sockeye, Coho, Pink, and Chum salmon (*Oncorhynchus tshawytscha*, *O. nerka*, *O. kisutch*, *O. gorbuscha*, *O. keta*), Sitka Black-Tailed Deer (*Odocoileus hemionus sitkensis*), the Alexander Archipelago wolf (*Canis lupus ligoni*), and the Queen Charlotte goshawk (*Accipiter gentilis laingi*) (Brooks et al., 2024; Flitcroft et al., 2022; Haddad et al., 2015; Hanley, 2005; Kravitz & Blair, 2019; Moore et al., 2024).
- Reduction of critical ecosystem functions such as nutrient cycling, watershed regulation, and the maintenance of robust populations of ANILCA-protected traditional and customary use species, habitats, and Alaska Native lifeways (Brandt et al., 2014; DellaSala et al., 2011; Dietz et al., 2021; Healey, 2020; Lader et al., 2023; Loucks et al., 2003; Seiler, n.d.; Talty et al., 2020; Tanyaş et al., n.d.; Van Der Ree et al., 2011).
- Edge effects, habitat fragmentation, and microclimate alterations due to increased road density and canopy removal (Rykken et al., 2007; Sperry et al., 2008; Valente et al., 2023).

C. Climate Change Resilience and Carbon Accounting

- Net increase in carbon emissions due to removal of large-diameter, high-carbon-value old-growth trees (Besnard et al., 2025; Birdsey et al., 2025; Buotte et al., 2020; Farinacci et al., 2024; Law et al., 2023; Leighty et al., 2006).
- Loss of carbon storage capacity in soils and hydrological systems affected by road building (Booth et al., 2023; Dellasala et al., 2022; Fellman et al., 2017; McNicol et al., 2023).
- Reduced climate buffering capacity of intact forests under intensifying regional precipitation events and landslide risks (Betts et al., 2018; Frey et al., 2016; Lindenmayer & Laurance, 2017; Wolf et al., 2021).

D. Geophysical and Hydrological Risk Factors

- Increased landslide and sedimentation risk associated with road construction on steep, rain-saturated slopes (Tanyas et al. 2022; Lader et al. 2023).
- Disruption of fish habitat and passage due to road stream crossings (Kravitz 2019).
- Accelerated deterioration of karst hydrology systems and groundwater-dependent ecosystems (Bryant et al., 1998; Dixon et al., 1997; Hendrickson & Groves, 2011).

Our tribes emphasize that Indigenous Knowledge is best available science and must be used as the foundation on which assessments are based (Blevins 2024).

Indigenous Knowledge recognizes and safeguards the integrity of ecological systems over generational timeframes and thus must be integrated into baseline condition assessments and scenario modeling. Community-level data should be integrated to construct an accurate picture of environmental and cultural consequences (Blevins, 2024). Please reference the bibliography at the end of this letter for a full list of the specific citations used to inform our comments.

E. Indigenous Knowledge (IK)

- Community documentation and oral histories identifying:
 - Seasonal migration patterns of culturally significant wildlife.
 - Long-term observations of forest health and change.
 - Indigenous management, harvest, and land-use practices adapted to the specific ecology of homeland forests which encompass and include the Tongass National Forest.

F. Local and Tribal Data

- Harvest monitoring reports from tribal and state subsistence programs especially as information relates to effects observed in proximity to roads and roaded areas vs those less proximate to roads and roaded areas.
- Where available and allowable, maps of traditional use areas and cultural and sacred sites within tribal homelands.
- Road maintenance and cost data by district.

Each of these impact domains and knowledge sources requires thorough spatial, temporal, and cumulative analysis under NEPA, including disclosure of mitigation measures, tradeoffs, and irretrievable losses. A thorough ANILCA 810 analysis is a required component of the evaluation of environmental impacts. Taken together this information significantly contributes to our tribes' ability to understand the effects of federal actions on traditional ways-of-life and subsistence resources. We strongly urge that these sources inform both the selection of alternatives and the EIS analytical framework.

III. Legal and Procedural Concerns Affecting Tribal Interests

A. Inadequate Consultation and Federal Trust Responsibility

The NOI does not satisfy the consultation requirements outlined in Executive Order 13175 and the USDA's Departmental Regulation 1350-002, which requires early and substantive tribal engagement in policy development. Various other federal laws, such as the National Historic Preservation Act (NHPA), National Environmental Policy Act, and ANILCA, also require consultation and engagement. Despite these requirements, our current experience of recent consultation processes continues to appear more procedural than meaningful. Per a June 26th comment letter from Tlingit & Haida:

“This decision was made without tribal consultation and therefore violates the federal government's legally mandated trust responsibility to tribal nations. As such, we do not recognize the legitimacy of this action until meaningful, government-to-government consultation has occurred. This unilateral rescission disregards the inherent sovereignty of tribes, undermines the rights of the Indigenous peoples of Southeast Alaska, threatens the health of the land that our communities have stewarded for millennia, and disregards the foundational government-to-government relationship that should guide all federal actions involving tribal homelands”.

This follows an unfortunate pattern of failed communication and breaches of trust articulated in the 2020 APA Tribal Homelands Petition submitted by twelve federally recognized Alaska Native tribes (Organized Village of Kasaan et al., 2020).

We therefore request:

- Co-development opportunities on topics of tribal priority (see above) during the development of the EIS.
- Formal, government-to-government consultation prior to finalization of the environmental impact statement, and written documentation articulating how our points have been included in the final EIS.
- A detailed and comprehensive analysis of potential impacts on subsistence resources, pursuant to ANILCA Section 810.
- Co-development of project-level consultation protocols tied to proposed road construction or timber sales.
- Regular tribal briefings, including both consultation and engagement, during the EIS process and inclusion of tribal representatives on interdisciplinary review teams.

B. Potential Violations of Environmental and Cultural Protection Statutes

The proposed action may implicate several statutes, including:

- **National Environmental Policy Act (NEPA)** – Incomplete scoping, failure to consider reasonable alternatives, and insufficient cumulative impact analysis.
- **Endangered Species Act (ESA)** – Inadequate consideration of the effects of habitat loss on listed species and their critical habitat.
- **National Historic Preservation Act (NHPA)** – Risk to unrecorded sacred and cultural sites.
- **ANILCA Section 810** – Consideration and priority of traditional and customary use species and the potential impacts of federal actions.

Failure to address these concerns in the EIS may render the final rule legally vulnerable.

V. Conclusion and Requests for Follow-Up


The undersigned Tribes urge the USDA to reconsider the rationale and direction of this rulemaking. The proposed rescission appears to privilege extractive economic interests and broad generalizations about wildfire risk—conditions that are inapplicable to the temperate rainforest systems of the Tongass. Our forest requires management grounded in place-based knowledge, tribal sovereignty, and a recognition of the ecological complexity of the Tongass, not administrative uniformity. While this is the ostensible motivation behind the proposed rescission, we submit that federal oversight and standardization of environmental review is still urgently needed: Despite the multiple use mandate and reliance on forest plans for direction and governance, the USFS still affords a privileged position to the timber industry via agency reliance on timber receipts to complete mandated work including restoration actions and infrastructure maintenance.

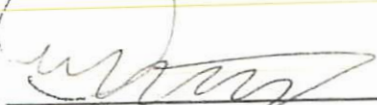
We request:

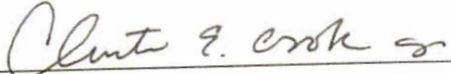
- 1 Full development and consideration of the alternatives outlined above.
- 2 Comprehensive ecological, cultural, and climate-related impact analysis including indirect and cumulative impacts.
- 3 Integration of TEK and tribal data as required by NEPA and Executive Orders.
- 4 In addition to the consultation-specific requests listed above, clear timelines for ongoing consultation and co-development opportunities with tribal governments.
- 5 Formal documentation of how tribal comments will be addressed and incorporated into the Draft EIS.


The undersigned tribes stand ready to support a collaborative and scientifically grounded planning process—one that respects Indigenous governance, sustains local communities, and ensures the integrity of the Tongass for future generations.


By signing below, the undersigned Tribe affirms support for these technical comments on the proposed rescission of the 2001 Roadless Rule as applied to the Tongass National Forest.


Signature:  Title: President
Tribe: Central Council of Tlingit & Haida Indian Tribes of Alaska Date: 9/15/2025

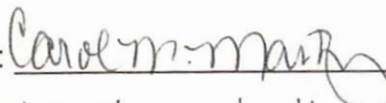
Signature:  Title: Tribal Administrator
Tribe: Hoonah Indian Association Date: 9/15/2025


Signature:  Title: President
Tribe: Craig Tribal Association Date: 9/16/2025

Signature:  Title: President
Tribe: Organized Village of Kake Date: 9/17/2025

Signature:  Title: Tribal President
Tribe: Klawock Cooperative Association Date: 16-Sept-25

Signature:  Title: Tribal Council President
Tribe: The Organized Village of Kasaan Date: 9/16/2025

Signature:  Title: President
Tribe: Petersburg Indian Assoc. Date: 9/17/25

Signature:  Title: President
Tribe: Ketchikan Indian Community Date: 9/19/2025

Signature: Jaime Bricker Title: President
Jaime Bricker [Sep 17, 2025 18:51:35 AKDT]

Tribe: Skagway Village dba Skagway Traditional Council Date: 17/09/2025

Signature: James Hart Title: President

Tribe: Chilkoot Indian Association Date: 9/18/2025

Signature: Alanna G. Jett Title: President

Tribe: Douglas Indian Association Date: 9/19/2025

Signature: [Signature] Title: Mayor

Tribe: Metlakatla Indian Community Date: 9-19-25

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