The Tongass as an Indigenous Place Draft Assessment

Haa shukaadéi Wóoch.een yagaxtookoox. We will go forward into our future together.

Cover Photo: Taken by Bethany Goodrich. Tlingit phrase and translation by Roby Littlefield.

Introduction

There is a unique and important relationship between the Tongass National Forest and the indigenous people of Southeast Alaska, whose time in the area spans millennia. The 2012 planning rule requires the Forest Service to encourage participation by Tribes and Alaska Native Corporations throughout the planning process and to request information about native knowledge, land ethics, cultural issues, and sacred and culturally significant sites. Tribes and Alaska Native Corporations are best situated to provide information on areas of tribal importance within the Tongass. In addition, the Secretary of Agriculture, in his response to the 2020 Tribal Homelands Petition, directed the Forest Service to respond to that petition through the Tongass Plan revision process. To lay a foundation for full consideration of the knowledge and deep connection of Southeast Alaska Native people to the Tongass National Forest, the Forest Service partnered with Spruce Root, Inc. to engage tribes and Alaska Native Corporations in providing the valuable perspectives and insights collected in the attached assessment section: *The Tongass as an Indigenous Place.*

The views expressed in this assessment section were compiled by Spruce Root, Inc. and do not necessarily reflect or exhaustively express the views of the Forest Service or the Tribes and Alaska Native Corporations consulted. However, the perspectives and insights in this document, as well as detailed information provided by participants about areas on the Tongass that are known to be of importance to Alaska tribes and Alaska Native Corporations, will be evaluated by the Forest Service as part of the revision process.

We are deeply thankful for the work of the authors and for the generosity of the contributors for sharing their knowledge and perspectives.

The Tongass as an Indigenous Place Draft Assessment

Tongass National Forest Plan Revision

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Foreword

In this document we attempt to tell a long, long history in an abbreviated manner that can't justly capture all the understandings that Southeast Alaska Tribal communities would like to share with the Forest Service. This assessment aims to provide a foundation that can be built upon, through curiosity, a deeper reading into the source documents we cite, and most importantly, continued conversations with Tribal leadership.

Learning this long history of place, culture, and people needs to be the basis for working with Tribes and understanding why their priorities are so important. Understanding the depth of knowledge, values, and love that the Tlingit, Haida, and Tsimshian people have for our homelands will demonstrate why we are proven and time-tested stewards of the Tongass and need to be included in all management decision-making.

Throughout the Tribal engagement done for this assessment, the Tribes wanted the Forest Service to understand a few key points: that the Tongass is made up of their homelands; that they have a history that can't be told in a single meeting; that they have buried their ancestors on these lands; and that these ancestors carried stories that stretch back to the beginning of their time in this place, well over 10,000 years ago. For them, the conversation cannot move forward until this history is confirmed, along with the understanding that they hold every living being in the Tongass precious, and are tied to the spirits of everything from the rocky mountain tops to the bottom of our oceans.

Our culture bearers would let us know that when we walked into Aas Kwáani, the home of the tree people, we had to thank them. We must thank them for the air that we breathe, for the transportation that they provide with our canoes, for the homes they give us, for the fire that warms us and cooks our food, and for the nourishment and shelter they provide our most precious relatives: the deer people and the salmon people. This is the respect that we as Indigenous people hold for our forests. And this respect informs the intrinsic responsibility our Tribes and Native communities bear to care for our forests. The relationship between Native people and the land is more than reciprocal; it is familial.

Once this basis of understanding is created, the priorities of the Tribes in Southeast Alaska become clear. They want the forests protected, yet usable, as they always have been. They want the deer to be carefully managed, and salmon streams kept healthy and productive. They want access to the forest for cultural purposes, such as totem poles, weaving material, medicine, and all traditional harvesting. They want jobs on the land for Tribal citizens. They want their ancestral knowledge and value systems to be utilized in stewardship of their homelands, as they have always been, which means they require a seat at the decision-making table.

There are, of course, a much broader set of priorities with greater detail that each sovereign government holds for their own traditional territory; but these are the common, core words we heard from all the entities that our Tribal Engagement team met with. It will be the responsibility of many to make sure that the words of the Tribal leaders and community members do not float aimlessly in the air. The Forest Service needs to heed these words today, but importantly, throughout the following years, the agency will need to add depth and understanding to these words by building trusted relationships with Tribes. Future leadership will have to listen intently to Tribal priorities, whether they are evolved from those expressed in this document, or newly crafted to address the challenges and opportunities of the future. What is expressed within this assessment can – and should – guide the work of the Forest Service as they work through the Tongass Forest Plan Revision in the coming years. Yet it will be the long-term duty and

responsibility of the Forest Service to work side by side with Tribes and communities to create the outcomes that our region is seeking today and into the future.

~Anthony Mallott October 21, 2024
Director, Spruce Root, Inc.
Member of the Tongass Forest Plan Revision Tribal Engagement Team.

Process and Methods

This assessment document is titled the Tongass as an Indigenous Place. This title reflects the fact the Tongass National Forest is, and always has been, the traditional homelands of the Tlingit, Haida, and Tsimshian people, who hold over 10,000 years of stewardship and recorded history on these lands and waters. This long history of stewardship is still practiced by Tribal governments, Alaska Native Corporations, and the Indigenous inhabitants of the region today. Forest Service leadership has recognized that the Tongass National Forest and the way that the inhabitants of Southeast Alaska interact with it is unique. The Tongass is not a destination that Southeast Alaskan Tribes, communities, and individuals go to; rather, it is quite literally in the backyard of these communities, which are often fully or partially surrounded by public lands. This adjacency to and the abundance of the Tongass affords community members and tribal citizens the ability to practice a way of life that is dependent upon and intrinsically tied to the health of the natural resources of the Tongass National Forest. As the reader will learn, this way of life is rooted in long Indigenous traditions and practices developed in tandem with the landscape over millennia.

To address the particular context of the Tongass, where Tribes are embedded directly within the forest and depend on it for their daily lives, Tongass Forest Service leadership took a novel approach to engage Tribes and Alaska Native Corporations in Southeast Alaska in the assessment process. For the purposes of the Tribal assessment topic, the agency increased resources and engaged in creative thinking to enhance community and Tribal input by leveraging the Sustainable Southeast Partnership (SSP), a regional collective impact network, and its administrative entity Spruce Root, Inc. A Tribal Engagement team was comprised of subcontractors Katie Riley (Sitka Conservation Society), Anthony Mallott (Sustainable Southeast Partnership Steering Committee), the Forest Service Tribal Relations department, and Spruce Root employees to conduct outreach to all Tribes and Alaska Native Corporations.

This assessment provides information about areas of tribal importance, existing tribal rights, and the conditions and trends of these areas on the Tongass National Forest as required by the 2012 planning rule (36 CFR 219.6(b)) and the Forest Service handbook (FSH) 1909.12, chapter 10 section 13.7. The content goes beyond these requirements and intends to provide insight into the history and context that provides the basis for the critical priorities that almost all Tribes articulated throughout the engagement period. This document primarily uses anglicized spellings and recognizes that spelling of terms for each societies differs significantly. Some traditional terms for important concepts that do not have a direct translation in English are also included; many are in Tlingit, and some are in the Haida (Xaad Kil) and Tsimshian (Sm'algya̲x) language as well.

The information within *The Tongass as an Indigenous Place* addresses the following:

- Indian tribes and Alaska Native Corporations associated with the plan area, detailed in Table 1.
- Information about the Tongass as an Indigenous place, and the Tlingit, Tsimshian, and Haida Cultures, Values, and Communities that live within it.
- A History of Government Actions on the Tongass that have impacted the Indigenous People of Southeast Alaska and their way of life
- Current 2016 Tongass Land Management Plan Direction as it relates to management of historical and cultural resources and sacred, historical, and grave sites
- Existing Tribal Rights and the laws that have shaped access to hunting, fishing, gathering, and protecting cultural and spiritual sites
- Natural and Cultural Resources of importance to Tribes on the Tongass

- Trends and Drivers impacting areas and resources of Tribal importance
- Information Needs for the plan revision
- Key Findings from Tribal Engagement
- A need for change from the Tribal perspective

Alaska Native Tribes and Alaska Native Corporations Associated with the Tongass National Forest

The Tongass National Forest consults with nineteen federally recognized sovereign Tribal governments that are located within and utilize the lands and waters of the Tongass as their traditional homelands. Mostly, Tribes serve and enroll the citizens of the community in which they are located; however, Central Council of Tlingit and Haida Indian Tribes of Alaska is a regional Tribe with region-wide citizenship and is headquartered in Juneau. The terms "federally recognized Indian tribe," "Indian tribe," and "Tribe" are used in the Forest Service Handbook FSH 1509.13 to refer to any Indian or Alaska Native tribe, band, nation, pueblo, village, or other community, the name of which is included on a list published by the Secretary of the Interior pursuant to section 104 of the Federally Recognized Indian Tribe List Act of 1994 (25 U.S.C. 479a-1). See also Executive Order 13175, Sec. 1(b).

The Tongass National Forest also consults with thirteen Alaska Native Corporations that hold land rights within Southeast Alaska, including ten village corporations, two urban corporations, and one regional corporation, Sealaska Corporation. Alaska Native Corporations (ANCs) are state-chartered corporations that were formed under the 1971 Alaska Native Claims Settlement Act (ANCSA) to settle aboriginal land claims in Alaska. The corporations hold fee simple title to a portion of their traditional homelands. Individual Alaska Natives that lived in the region or community at the time that ANCSA was passed were enrolled in these Alaska Native Corporations and became their shareholders. For example, Sealaska Corporation, the regional Alaska Native Corporation for Southeast Alaska, has over 26,000 shareholders of Tlingit, Haida, and Tsimshian descent (Sealaska, n.d.). For more information on ANCSA and Alaska Native land claims, see the *Existing Tribal Rights* section of this assessment. Forest Service Handbook 1509.13, chapter 10 requires that "In Alaska, the Forest Service is also required to consult with Alaska Native Corporations (ANCs) on a government-to-corporation basis rather than government-to-government. See: Executive Order 13175 as modified by Public Law 108-199, 118 Stat. 3, 447, as further modified by Public Law 108-447, 118 Stat. 2809, 3267."

It is worth mentioning that there is tension between the Tribes and Alaska Native Corporations about their legal distinctions. For many purposes, Alaska Native Corporations are considered 'Tribes,' as defined by the 1975 Indian Self-Determination and Education Assistance Act. However, ANCs are not sovereign tribal governments as defined by the Federally Recognized Indian Tribe List Act of 1994, and they do not have a trust relationship with the federal government. Therefore, some Tribes have expressed concern about Alaska Native Corporations being consulted in the same manner as Tribes. Yet ANCs were created by Congress, and as the largest private landowners in Southeast, Alaska, with Indigenous shareholders from the Tongass, they have their own unique standing with the Forest Service that can be utilized for collaboration and community relationship building.

Table 1 lists all nineteen federally recognized tribes in Southeast Alaska, along with the village, urban, and regional corporations, and the associated Forest Service Ranger District. Five communities in Southeast Alaska were not addressed in ANCSA, and lack village/urban corporations: Haines, Tenakee, Wrangell, Ketchikan, and Petersburg. Each of these five are noted as a "Landless community" below, as

they are referred to colloquially and in legislation. Metlakatla has a reservation instead of an ANC which is also noted.

Table 1. Federally Recognized tribes, Alaska Native Corporations, and Ranger Districts.

Tribe	Alaska Native Corporation	Ranger district
Angoon Community Association	Kootzoowoo, Inc.	Admiralty National Monument / Juneau Ranger District
Craig Tribal Association	Shaan Seet, Inc.	Craig Ranger District
Central Council of Tlingit and Haida Indian Tribes of Alaska (T&H)	Sealaska, Incorporated Goldbelt, Incorporated	Juneau Ranger District
Douglas Indian Association	Goldbelt, Incorporated	Juneau Ranger District
Chilkoot Indian Association (Haines)	*Landless community	*outside of NFS bounds; served by Juneau Ranger District
Hoonah Indian Association	Huna Totem Corporation	Hoonah Ranger District
Hydaburg Cooperative Association	Haida Corporation	Craig Ranger District
Organized Village of Kake	Kake Tribal Corporation	Petersburg Ranger District
Organized Village of Kasaan	Kavilco, Inc.	Thorne Bay Ranger District
Ketchikan Indian Community	*Landless community	Ketchikan Ranger District
Klawock Cooperative Association	Heenya Kwaan, Inc.	Craig Ranger District
Chilkat Indian Village (Klukwan)	Klukwan, Inc.	*outside of NFS bounds; served by Juneau Ranger District
Metlakatla Indian Community	*Reservation	Ketchikan Ranger District
Petersburg Indian Association	*Landless community	Petersburg Ranger District
Organized Village of Saxman	Cape Fox Corporation	Ketchikan Ranger District
Sitka Tribe of Alaska	Shee Atika, Inc.	Sitka Ranger District
Skagway Traditional Council	None	Juneau Ranger District
Wrangell Cooperative Association	*Landless community	Wrangell Ranger District
Yakutat Tlingit Tribe	Yak-tat Kwaan, Inc.	Yakutat Ranger District

Collective and individual Tribal priorities were identified by thorough research conducted during the assessment process. Ahead of meetings with Tribes, the Tribal Engagement team developed framing papers that aggregated Tribal input on previous Forest Service rulemakings and projects, as well as known policy positions across a multitude of federal issues and departments. Presentations and work sessions were conducted with Tribal councils, staff, Alaska Native Corporations, Tribal Conservation Districts, and other interested parties. A survey was requested by an individual Tribe to circulate to Tribal citizens and council members, and this tool was made available to other Tribes as requested. Meetings with Tribes and Alaska Native Corporations sought to explain the Plan Revision process, provide

information about the timeline, and clarify the various avenues open to Tribes to express their positions. During these meetings, information sources and key data were identified to contribute to the assessment.

Scope and Scale of Assessment

The geographic scale of the assessment covers the entirety of Southeast Alaska and the boundaries of the Tongass National Forest, from Yakutat to Metlakatla. There are nineteen Tribes located in this area that derive their heritage from and hold interests in the lands now known as the Tongass National Forest. There is only one reservation within the scope of the assessment, which is the Annette Island Reservation that is governed by the Metlakatla Indian Community. More information on current and previously existing reservations in Southeast Alaska can be found under VI. History of Government Actions Regarding the Tongass National Forest.

In the assessment, nearby marine areas and coastal ecosystems that border US Forest Service lands were included as they are important to the Tribes in the region, and because the health and productivity of the marine and terrestrial landscapes is understood to be linked. Management direction and activities on USFS lands impact the health and availability of resources present in coastal and marine environments. In addition, during the assessment process some Tribes raised concerns about activities that occur primarily in aquatic or marine environments that have land-based impacts or components that support marine activities, including the storage of mariculture equipment, the presence of marine debris above the mean high tide line, and pollution effects.

The waterways of the Inside Passage in Southeast Alaska are considered to be the region's highways by Alaska Native people. Canoes were a primary means of transport when trading between clans, villages and other tribes in the region. These routes were important for trading items that are found in some areas but not in others, including food items, copper, cedar for making totems, clan house planks, canoes, etc. Inland trading routes with Interior tribes occurred through river valleys such as the Unuk, Stikine, Taku and Alsek Rivers, in addition to historic trails like the Chilkoot Trail.

Existing Information Sources

The sources of information that were used to inform the assessment include Forest Service documents, records, studies, and reports, as well as documents submitted by Tribes that reflect their priorities. From the federal government, existing information sources include the 2016 Amendment to the Tongass Land Management Plan, Executive Order 13175 Consultation and Coordination with Indian Tribal Governments and Executive Order 13007 on Indian Sacred Sites, in addition to reports and prior communications with Tribes. Prior comments and consultations that Tribes have contributed to regarding recent Forest Service Planning efforts, such as the 2019 Roadless Area Conservation Rulemaking, the 2022 Southeast Alaska Sustainability Strategy Forest Management process, and the 2023 National Old Growth Amendment, have also informed the assessment.

Tribes have contributed a wealth of information to the agency for this planning process, including tribal climate change adaptation plans, community forest partnership reports, Tribal strategic plans and Tribal economic development plans, and Tribal environmental plans (EPA Tribal Environmental Plans). Some Tribes have submitted correspondence directly to US Forest Service leadership and the Secretary of Agriculture regarding important cultural resources and management concerns. Pertinent correspondence includes the Request for Cultural Red Cedar Trees and Economic Assessment of Traditional Carving, Weaving, and Artisan Economy (Redcedar Letter) that was submitted by the Organized Village of Kasaan, the Klawock Cooperative Association, the Organized Village of Kake, and the Hydaburg Cooperative Association in 2020, which summarized the four Tribes' priorities and demands for a funded cultural use

log harvest program and a long-term cultural wood management plan. More details on the Redcedar Letter are in section VIII. Natural and Cultural Resources below. Another foundational document regarding the Forest Plan revision is the Tribes' Petition for USDA Rulemaking to Create a Traditional Homelands Conservation Rule for the Long-Term Management and Protection of Traditional and Customary Use Areas in the Tongass National Forest (the Petition), submitted by twelve Tribes: Organized Village of Kasaan, Organized Village of Kake, Klawock Cooperative Association, Hoonah Indian Association, Ketchikan Indian Community, Skagway Traditional Council, Organized Village of Saxman, Yakutat Tlingit Tribe, Central Council of Tlingit and Haida Indian Tribes of Alaska, Craig Tribal Association, Wrangell Cooperative Association, and the Angoon Community Association. The Petition (2020) sought in part to protect customary and traditional uses on the Tongass National Forest, and the areas where they are practiced, since the current Forest Plan and other regulatory structures lack such protections. The Secretary of Agriculture responded to the petition by stating that the United States Department of Agriculture (USDA) and the Forest Service would seek to address the petitioner goals through local decision-making. Thus, the Forest Service is utilizing the Tongass Forest Plan Revision process to address the petition's concerns and goals. For more information on the 2020 Petition, see 'co-management priorities' under section IX. Trends and Drivers below.

In addition to these documents submitted by individual or groups of Tribal governments, non-profit entities such as the Sealaska Heritage Institute have provided information through discussions, reports, research, and documentation regarding management and protection of sacred sites, Southeast Alaska Native ethnographic studies and material, traditional knowledge and practices. Other sources of information that were used to understand areas of Tribal importance and cultural and historical use of resources include reports and proposals from the Southeast Alaska Subsistence Regional Advisory Council, the Federal Subsistence Board, Alaska Department of Fish and Game Subsistence Division, Alaska Department of Fish and Game Fisheries Management assessments and reports. The literature cited is recommended as a starting point to learn about the deep history of the Tlingit, Haida, and Tsimshian people and their interactions with this landscape; yet it is by no means exhaustive or conclusive. These sources are intended to help provide a starting point for learning about the rich Indigenous history of this region, and Forest Service employees should strive to continually expand their engagement and understanding of the first inhabitants of this place.

The Tongass as an Indigenous Place: Tlingit, Tsimshian, and Haida Cultures and Communities

The lands of Southeast, Alaska and lands beyond that stretch North, South and into the interior of Canada have been occupied by the Tlingit, Tsimshian and Haida for well over 10,000 years. From the earliest anthropological research on these three sets of Native people, the culture bearers would say that we have been here since time immemorial. This history is corroborated through both western scientific and traditional research with dates that now stretch beyond 14,000 years (U.S. Forest Service, n.d). The length of time that these three groups have called these lands, their homelands, "Haa Aaní | Íitl' Tlagáa | Na Yuubm" is extremely important in understanding their connection to this land, and to all beings and spirits within these lands and waters. Tlingit, Tsimshian and Haida languages, behaviors, harvesting practices, relationships with all living creatures, and importantly their values, have all been created and evolved through this extensive time period. These three groups have traded, warred, migrated, gathered and mixed through marriage throughout their long histories, with all sharing foundational oral histories that tie to the ancient ice ages and to the trickster/creator Raven.

The similarities among the Tlingit, Tsimshian and Haida extend to art, housing, stories, songs, but each has a distinct language, not related to the others except for that the languages came from their homelands.

The traditional territories and customary land use and rights of the Tribes are well documented in a variety of sources since the late 1800s. While there is opportunity to confirm maps of traditional homelands of each as it stands today, the borders would look different through time, as territory was won, lost, and utilized throughout ancient and more modern migrations. However, what is consistent over time is the continuous use and occupation of the lands and waters of Southeast Alaska pre-contact with Western civilization. Dr. Walter Goldschmidt and Theodore Haas reported on the possessory rights of the Tlingit and Haida people to the Commissioner of Indian Affairs in 1947, describing the extent of this use and occupation as such:

> "The Tlingit and Haida Indians have continuously used and occupied the lands and waters of Southeastern Alaska since before the first exploration of the area. They used all the bays, inlets, islands, and streams from a little south of the mouth of the Copper River to the southern tip of Alaska. Without knowledge of writing, hard metals or machinery, they developed one of the highest forms of civilization in aboriginal American north of Mexico. It was rich in ceremony and creative arts, and complex in its social, legal and political systems (1998, 4)."

Haa Aani, Our Land: Tlingit and Haida Land Rights and Use (1998) is generally comprehensive in identifying the possessory rights of Alaska Natives in Southeast Alaska, and maps within the reference provide a broad accounting of areas where hunting, fishing and gathering activities occurred prior to 1947 when the book was first published. Appendix A: Areas of Tribal Importance represents some, but not all inclusive, areas of known tribal importance as extracted from literature. Individual Tribes should be consulted as to their understanding of the findings in Goldschmidt & Haas.

With a brief understanding of the similarities between these Native people, it is worth documenting each one's specific cultures, traditions, and values. This chapter will examine the Tlingit nation, the values, and practices common amongst all three Tlingit, Haida, and Tsimshian nations, and then detail the Haida and Tsimshian communities and cultures within the Tongass.

A. Tlingit Social and Place-based Organization

The Tlingit are the largest Native group within Southeast Alaska in terms of population, traditional territory, and communities. Tlingit social structure is defined through a clan system that is organized under two main moieties, Eagles and Ravens. The Tlingit are a matrilineal society, where children become members of their mother's clan. A significant rule of this system was that marriages were to occur amongst opposites, Eagles marry Ravens, and vice versa. There are many clans throughout Southeast, most tied closely through groups called kwáans, or people of a place.

Dick Newton and Madonna Moss describe traditional land ownership in Haa Atxaayi Haa Kusteeyix sitee: Our Food is Our Tlingit Way of Life (2005, 36):

> "Kwáans are composed of a number of clans each of which traveled seasonally to subsistence camps but returned to a permanent winter village to join the other clans belonging to that kwáan. Hunting grounds, fish streams, and berry patches are owned by particular clans. The naa sháadei háni, the clan leader of the ranking house of a clan, is the caretaker, the guardian of a territory. He is the one to allocate these resources to his relatives; these are the lands and waters that enable clan members to live the Tlingit atxaayí way of life. A kaa sháadei háni, head of the individual clans, also has the authority to grant permission to members of other clans to use the land. The Tlingit were, and continue to be, abundantly aware of the lands' value, and it could be exchanged, or even given away when deemed necessary. If one clan incurred a large debt, a particular tract of land could be given away to another clan in payment or reparation. Members of clans other than

the one possessing a piece of land might have ties to it through their marriage into the land-owning clan."

For the purpose of the assessment, it can be helpful to understand that in Southeast Alaska, Tribes mostly correspond to a kwáan, with a few deviations. Richard Newton and Madonna Moss (2009, 35) describe this correlation, stating "The tribes of the Tlingit are known as the kwáan, kwáans is the term that best equates to tribes. In Tlingit, the word kwáan is used with a place name; however, in English the word stands alone as an independent word. Each kwáan is named for certain physical features of the country inhabited by its member clans. For instance, Xóon niyaa (Hoonah) means shelter from the north wind. [...] the Keex Kwaan (Kake Tribe) after a stream on Kupreanof Island."

Each clan has ownership of animal crests and also place crests that tie to their oral history. Most clans have come about the ownership of their crests through supernatural events, or significant events where clan members have died. All clans hold important areas that are defined through a clan ownership structure closely tied to harvesting and stewardship. There is further organization under clans within house systems. Current day connection to a specific house within a clan has been disrupted by modern living situations, but houses are still important in terms of oral history, additional unique crest ownership, and ownership of places within a kwáan. There are maps and research that illustrate the structure of clans and houses for each community, and understanding these historic social ties and deep connections between people and place can be an important starting point for building a relationship with the Native people of the communities the Forest Service works in.

The working relationship that the Forest Service has with federally-recognized Tribes does not always have a clear connection to the long historical system of clans and place ownership. Tribal governments in their current form are a Congressionally-created system for Native people that was applied across North America through the 1934 Indian Reorganization Act. The Tribal governments created under this structure often do not directly correspond to the social, legal, and governance structures that existed pre-contact. To build a good relationship with a Tribal community, the Forest Service must maintain a strong government-to-government relationship with the sovereign Tribes, but also understand the history of the clans and ownership of traditional territories to really create progress and relationship within a community.

In many instances, Tribes have worked to integrate clan history and priorities into their structure, and some Tribes will want to consult with specific clans about uses planned in their traditional territories. It is worth the time of the Forest Service to understand this integration and work with the Tribes to determine if additional engagement and direction from specific clans or kwáans, such as with the Aak'w Kwáan in Juneau, is warranted. The Forest Service does not currently hold trust responsibility or consultation requirements for individual clans or kwáans, which differs from their responsibility to federally-recognized Tribes. A strong government-to-government relationship must be rooted in the understanding that the federal government holds a trust responsibility for all Indian Tribes; which requires that "the federal government act with the utmost integrity when dealing with Indian tribes, and that laws and treaties be interpreted in a manner protective of Native rights" (Voluck, 1999, 97).

One of the most critical things to understand about the connection that Indigenous people have to their land is the role that their surrounding ecosystem played in the development of the culture and the knowledge, traditions, stories, values, and behaviors that comprise it. From Langdon, Deiki Noow, in Sergei Kan's Sharing Our Knowledge: "Thornton (2007, 365) believes that the **knowledge of places [clan property, possibly most important] is foundational to the installation and development of individual and social character among Tlingit."** This perspective helps illustrate why the issue of land – access, use, ownership, and management – is so foundationally important to Tlingit, Haida and Tsimshian culture and people.

B. Indigenous Value Systems

Tribes have worked diligently to tie to the history of the clans they represent to their current values. The Central Council of Tlingit and Haida Indian Tribes of Alaska (further referred to as CCTHITA or Tlingit & Haida) utilizes and defines Southeast Traditional Tribal Values or "Our way of life" as follows (Central Council of the Tlingit and Haida Indian Tribes of Alaska, n.d.):

- Discipline and Obedience to the Traditions of our Ancestors
- Respect for Self, Elders and Others
- Respect for Nature and Property
- Patience
- Pride in Family, Clan and Tradition is found in Love, Loyalty and Generosity
- Be Strong in Mind, Body and Spirit
- Humor
- Hold Each Other Up
- Listen Well and with Respect
- Speak with Care
- We are Stewards of the Air, Land and Sea
- Reverence for Our Creator
- Live in Peace and Harmony
- Be Strong and Have Courage

This value system has been defined through the work of a wide variety of leaders within Tlingit & Haida's history, many of whom have been leaders within the Alaska Native Brotherhood (ANB) and Alaska Native Sisterhood (ANS), such as Walter Soboleff and Elizabeth Peratrovich. These leaders had traditional upbringings, where their aunties and uncles instilled these values within them and gave them the responsibility to carry the translation and use of these values forward for future generations. These values are translated through stories that highlight behaviors that were necessary to what culture bearers call 'our way of life', whether the lessons were tied to harvesting, or relationship within clans, with our opposites, and with the natural world. Historically, a Tlingit clan member could bring pride and many benefits to their clan by representing these values and behaviors, or could bring shame to a clan for actions that fall outside of these values. This history makes the value system aspirational for individual Tlingit people, Tribes, and all Native organizations to live up to, given that this knowledge system has been created and perpetuated over an immense time period and carries the wisdom of their ancestors.

Many other Tribes and Alaska Native Corporations (ANCs), share their values within their websites or strategic documents; these should be individually reviewed when working with any Tribe or ANC. For example, regional ANC Sealaska Corporation and their non-profit entity, Sealaska Heritage Institute, have worked with a council of traditional scholars that include Tlingit, Haida, and Tsimshian culture bearers to define "Core cultural values" (Sealaska, n.d.):

Haa Aaní | Íitl' Tlagáa | Na Yuubm: Our Land

- The basis of our collective identity and culture
- Utilizing the land while protecting our future generations
- Sustainable relationship with our lands

- Sustainable community economies

Our homelands are the ocean and land environment that our people cared for and sustained themselves on for over 10,000 years. That deep connection to place led to sustainable practices and values that are valuable to current day businesses and issues our global environment faces. This value, tied to our homelands, lead us to strive for sustainable communities and a sustainable relationship with our land and ocean.

Haa Shuká | Íitl' Kuníisii | Na Hlagigyadm: Our Past, Present, Future

- Our collective identity reaches across generations
- Sanctity of ancestral cultural and sacred sites and heritage
- Social and financial benefits for current and future generations

Represents our respect for our ancestors and our drive to pass our cultural heritage to present and future generations while simultaneously creating prosperity and opportunity for them. We base decisions on our understanding of the past and on our plans to advance both present and future generations.

Haa Latseen | Íitl' Dagwiigáay | Na Yugyetga'nm: Our Strength, Leadership

- Our collective identity gives us strength
- Discipline, Resilience, Perseverance, and Adaptability
- Education and training for leadership
- Healthy families and communities

Represents our resilience, our strength, and our responsibility to train so that we perform our duties to the best of our abilities. It leads us to invest our assets in areas where we can use our strength and competitive advantages for the optimal future benefit of our Shareholders. Our individual strengths are best utilized within a cohesive team that portrays Wooch.Yax.

Wooch.Yax | Gu dlúu | Ama Mackshm: Balance, Reciprocity and Respect

- Our collective identity relies on spiritual and social balance
- Institutional partnerships and collaboration
- People, tribes, and organizations working together (Wooch.éen)

Represents the balance that we expect to create within all relationships, including our relationship with our natural resources. Companies, relationships, and projects that do not provide adequate value or do not fit with our core values disrupt our balance. As balance also includes the relationship that we have with our employees, our company culture must reflect how strongly we value the input of all Sealaska personnel. Our executive team accordingly strives to create space for every voice to be heard.

Sealaska Heritage Institute and Sealaska have shared and utilized these values broadly, tying them directly to the history of Native people and their way of life in their homelands.

C. Tlingit Cultural Foundation and Practices

One of the most important cultural practices of Tlingit people is the koo.eex, a traditional party or gathering that includes a host clan and attendance by the clan's closest relatives and opposite clan members. Many of the values described above are utilized within a koo.eex, most importantly,

Wooch.Yax, the need to maintain balance, create reciprocity, and show respect, both by hosting the party and by being present as a guest.

The ability for clans to continue holding and practicing the values inherent in a koo.eex is a very important priority that touches on many of the Tribal priorities highlighted through this assessment process. Holding and attending a koo.eex involves food security, food sovereignty, relationship building, a return to living a traditional way of life that has been extremely disrupted by western contact, and also, highlights the healing power of the Tlingit value system for Tlingit people. To demonstrate the interwoven nature of ceremony, food, traditional way of life, and cultural development, Richard Newton and Madonna Moss (2009, 5) write: "It was the highly developed technology of food preservation and storage that guaranteed survival and permitted such elaboration of social and ceremonial aspects of culture."

A koo.eex also entails many practices of maintaining clan history, clan ownership of places, and clan names on the land. As researchers Dr. Walter Goldschmidt and Theodore Haas (1998, 7) noted when they were examining aboriginal claims and land rights in the 1940s, **"In order to determine the nature of the rights to land of communities amongst the Tlingit and Haida people, it is necessary to understand the character of their customs and modes of life."** This all makes it worthwhile for the Forest Service to build understanding of this critical cultural practice by working with Tribes, as well as local and regional Native entities dedicated to cultural transmission and learning, to have greater resources and knowledge-sharing about koo.eex's to extend to those working with our Tribes.

Tlingit value and knowledge systems were taught and engrained through story, praise and shame for positive and negative behaviors, direct apprenticeship with masters, training with clan uncles and aunts, and also through their relationship with all beings and spirits within their homelands. Many Tlingit stories tell of the knowledge gained through relationships with other beings, such as the salmon people, the bear people and the tree people. The Tlingits believed that these relatives all lived as the Tlingit did: they had human and animal form and lived in clan houses. There were intermarriages and many crossings of animal beings into the Tlingit world and of Tlingit people into the animal world.

Tlingit culture bearers were very stern in expressing that this is Tlingit history, not just children's stories you tell around the fire. This history defines our relationship with everything in our homelands and is elevated in value from the connection and knowledge-sharing that came not just from the Tlingit ancestors, but all beings and spirits of these lands and waters. This history and these stories were developed over thousands of years, as lessons were learned about how resources must be stewarded properly to ensure clan survival. As Newton and Moss (2009, 32) describe, "Stories reveal various figures as the source of knowledge of many traditional subsistence skills. [...] With this kind of knowledge came certain ethical responsibilities governing relations both with the natural and human world. Dire consequences might result from digression from the proper patterns of behavior."

Much of the foundation of Tlingit values and relationships with their homelands comes from ancient Raven stories, Yeil Tlagu. These stories have been told, lived, shared and evolved since the last great Ice Age over 12,000 years ago. They provide the Tlingit people a creator, Raven, who loved the Tlingit people so much that he brought them water, and created all the rivers and lakes within our homelands. Raven brought them light, the sun, moon and stars, which was the point that the ancient beings separated into Tlingits, and beings of the land, water and sky, defining every being within our homelands as ancient relatives that survived the Ice Age, as one. He brought them fire from the distant ocean, which tied Tlingit spirit to everything within our homelands from the mountains, to the plants, to all living things. **This deep history solidifies the perspective of the Tlingit people as relatives to all things, and sharing the same spirit of place with everything within our homelands. In turn, this history defines the stewardship, care, balance, and respect that is carried out throughout history and because of its power and**

ancientness, will carry forward to all future generations. The following quote offers another depth of understanding to the Raven stories that create the relationship of body and spirit that we have with Haa Atxaayi, our traditional foods:

> **"Tlingit people have special regard for their traditional foods, partially because theirs is a direct connection with the living things that provide the food (*Newton & Moss, 2009, 2*)."**

The importance of this value system is difficult to convey and translate without decades of hearing the stories, living the Native way of life, and being in the forests and on the water. Even so, it still is important to express the value of this knowledge system and oftentimes prose and story offers the most impactful translation. This is an excerpt from past Alaska Writer Laureate, Tlingit culture bearer, and author, Ernestine Hayes from her Pleistocene Raven (2024) writings:

> "We place our intellectual discoveries into boxes of knowledge. We place into those boxes of knowledge our observations, the results of our studies, our assessments of predictable outcomes, the intellectually sound conclusions we learn from watching the world: our gathered, analyzed, organized Indigenous knowledge lighting the way for each generation in long-established Indigenous custom developed over thousands of years and hundreds of generations.
>
> Boxes of knowledge contain Indigenous tradition: experience, judgment, custom, and belief, transmitted from generation to generation clothed in metaphor and rooted in place. These boxes are seeds of knowledge planted deep in the soil of lived generations that burst into stories of amazing things we have seen. Our stories speak of shapeshifted bears, firehawks, trickery, and prodigal stars. We tell stories of death and birth, happiness and grief. Loss. Revenge. Sacrifice. Love. Stories of journey and return. We sing, we carve, we write, we gather. We tell history."

D. Haa Atxaayi Haa Kusteeyix sitee – Our Food is Our Way of Life

The Tlingit, Haida and Tsimshian value system creates an elevated priority for Tribes on the Tongass regarding food and harvesting as their traditional way of life. The Tribes' 'way of life' priority keeps Tribal citizens fed, heals them, builds their strengths, ties them to their ancestors, to their homelands, and all their relatives of this place. The importance of protecting this way of life was a common priority voiced in every meeting conducted by the Tribal Engagement team.

One of the most common components of these conversations with Tribes was their desire to express the difference between the policy and legal term 'subsistence' as defined in the Alaska National Interest Lands Conservation Act (see section VII. Existing Tribal Rights) and the way Tribes feel about traditional harvesting as being their way of life. When thinking about subsistence management within this more holistic "way of life" framework, the Forest Service can work with Tribes to understand historical harvest and stewardship practices, integrate value systems and stories, utilize Indigenous knowledge to better inform management practices, and overall create vastly improved co-stewardship efforts.

When discussing their priority to protect their traditional way of life, Tribes often used the terms 'food sovereignty' and 'food security' as additional important drivers of this overall priority. Especially for Tribes that are within isolated, rural communities, food security is of utmost importance. These Tribes and their rural communities face elevated costs of living across every category, from transportation and food, to energy and heating. Southeast Alaskan Tribes want the Forest Service to understand that their ability to traditionally harvest provides significant economic benefits along with the health, social and cultural benefits. Being able to keep ones' stores and freezers full of traditional foods allows individuals and families to save limited cash for other basic needs.

Food sovereignty is a goal that all Tribes have, given that for millennia, their ancestors have practiced food sovereignty across their homelands. Food sovereignty can vary in definition from Tribe to Tribe, but at its core it is the right and responsibility to steward food resources, have access to all traditional food sources, and define harvest practices and seasonal harvest periods that meet the needs of their community. **When combined in one significant framework that drives forest management, traditional way of life, food security, and food sovereignty can become the overarching priority for pursuing co-management and co-stewardship agreements with Tribes, and can create the greatest benefit that the Forest Service can provide Tribal communities.**

The Forest Service has recognized and worked to address this priority for decades, as evidenced from the investments that they put towards creation of the document Haa Atxaayi Haa Kusteeyix sitee, Our food is our Tlingit Way of Life: Excerpts of Oral Interviews by Forest Service employees Richard G. Newton and Madonna L. Moss (2009). The excerpt below is the very first sentence within the Dr. Moss's foreword:

> **"The Forest Service recognizes the value of the Tlingit knowledge regarding the land and resources it manages."**

While this document is decades old, this remains the best beginning statement that the Forest Service can make when working with Tribes.

Additional excerpts from this document describe research methods and understandings that were discerned through the process of working with elders. This understanding is helpful for Forest Service employees who may be concerned that their consultations and conversations with Tribes do not always directly address the proposal at hand.

> "Dick's assignment was to gather information about subsistence food. There was no formal plan of research, no tightly structured format to follow. Dick went to some of the villages and spoke with the elders in the Tlingit language. He taped and later translated and transcribed the interviews. The interviews cover many topics, including some not directly related to haa atxaayí. **In the typical Tlingit way, hard technical data are interwoven with subtleties of the Native worldview" (Newton & Moss, 2009, ii).**
>
> Richard Newton, "Dick", served as a Native Historian for the US Forest Service and offered some definitional starting points for the work of understanding Indigenous cultures and working with Tribes in Southeast Alaska (2009, iv):
>
> "According to Webster's Collegiate Dictionary, subsistence is the minimum food or shelter to support life. Tlingit people have learned how to survive the weather and keep body and soul together. We have special regard for the fish and other animals we use for food. We know and respect the weather and the waters. Fish streams, hunting grounds, and berry patches were more than a means of filling our "minimum daily requirements." For us subsistence food is a tangible link with the past, with a way of life that is quickly fading."
>
> "…Nowadays, young people are trying to remember the words of their grandparents. They are learning our subsistence ways. The interest in our traditions is growing not only because Indian food tastes good. **It is because it is one of the only ways our culture can survive."**
>
> "Our bodies are accustomed to the various food that we eat. Our body craves it, we have many things that nature provided by season. There are seasons for vegetables, greens, seasons for fat, seasons for shellfish, and seasons for many things when it's time for us to eat and enjoy them. All we have to do is accumulate them and put them away for the winter…. We never bothered anything out of season…. By putting up different foods and making them taste good we make it

> more pleasant to live…. The old timers had a certain way of preparing it, they all had their own methods and tricks…they took a great deal of pride in putting up their food so that people would enjoy eating it. (Tape 22)"

The *Haa Atxaayi Haa Kusteeyix sitee,* Our Food is our Tlingit Way of Life document has helped perpetuate many aspects of ancestral knowledge. It also describes the ways that Tlingit people have had their way of life, land claims, and traditional stewardship practices systematically taken from them through government policy, regulations, and economic activity resulting from Western contact (more information under section V: History of Government Actions Regarding the Tongass). For example, Tlingit place names are inextricably tied to geographic features or reference characteristics of a landscape that were of benefit to the community that used it, yet much of that knowledge has been lost as Indigenous languages were prohibited from being spoken.

> "Numerous forces were acting in ways to irreversibly change the Tlingit atxaayí lifeway. One of these was the declining use of the Tlingit language. Children were discouraged to speak Tlingit by missionaries, teachers, and in some cases by parents anxious for their offspring to learn survival skills in the English-speaking world (Newton & Moss, 2009, 2)."

> Additionally, policies regulating hunting and trapping impacted access to traditional harvesting sites and infrastructure. The Forest Service then used this imposed 'lack of use' to detract from the validity of aboriginal land claims (Baker et al, 1995).

> "George Davis describes how trapping was regulated earlier in the twentieth century: Trapping for the beaver was closed in 1916; in 1921 it was opened again. After it was opened up for that one year it closed again and reopened in 1927. This is what they have done to us; we have neglected our trapping shelters. While the trapping was closed, our cabins rotted away. This is what happened to us through the regulations of the game department. This is how we lost our trapping area. (Newton & Moss, 2009, 4)."

From this early example of loss of access to a traditional way of life, and access to traditional infrastructure and lands, one can extrapolate as to how, over the course of one hundred years, similar regulations have greatly degraded the Indigenous way of life.

Thus, it is important to recognize that while Indigenous people on the Tongass are still harvesting and living a traditional way of life, it is not completely akin to their traditional and customary practices. In order to support the growth of traditional lifeways, it is necessary to understand traditional practices before western contact, and to have a vision for returning those practices to the landscape and the people as much as possible, given the changed modern context. Building this vision of supporting traditional lifeways and ingraining Tlingit and Haida value sets into shared purpose and shared goals for the entire Forest Service will benefit not only Tribal people, but all of the communities and environments within the Tongass. The challenges and need of the Forest Service to address this history is summarized by Haida and Tlingit professor, Dolly Garza (Alaska Boreal Forest Council, 2003, 6):

> "We, as Natives, still maintain a cultural connection and a tribal obligation to care for these resources and help in whatever way seems possible. We go to meetings and plead to have the Gravina Island timber harvest reduced, eliminated, or have the transfer site moved to protect subsistence clam and beach asparagus beds. We attend meetings to let managers know they are taking too many salmon, too many trees, destroying too much precious habitat. We work to regain access to restricted parks like Glacier Bay National Park where we are denied use of spruce roots for weaving, berries, egg gathering; things we did for generations in documented Tlingit territory.

> We feel our words are not being heard. We come to feel the process is to fulfill a mandate, and not to address the conservation of the environment. Or we come to understand that the agencies, although sympathetic, have to meet broader agency and department goals: to maximize uses, to provide economic benefit and jobs. We find that national directors who must answer to Washington D.C. policies and politics overpower regional managers who listen and support our concerns. We find that, after thousands of years of acting as stewards to these lands, we are now anecdotal."

The following excerpts from *Haa Atxaayi Haa Kusteeyix sitee, Our food is our Tlingit way of life* (2009) add additional unique ways of thinking about the importance of food, proper stewardship, values, and traditional ecological knowledge that will be discussed and presented throughout this chapter.

> "The traditional Tlingit values of hard work and economic self-sufficiency were highlighted by several of our cultural specialists. It was customary in times past and still is to accumulate large surpluses of food and other property to redistribute at a koo.éex', a memorial party as described in Richard and Nora Dauenhauer's book Haa Tuwunáagu Yís, for Healing Our Spirit, or to trade with neighboring tribes. Social status was accorded to those members of the community who were industrious and who had high ambitions. These values were passed down to children from their elders. In the matrilineal society of the Tlingit, it was the uncle, usually the mother's brother, who taught these values to a growing boy. John Jackson was one person who grew up within this tradition, and his narrative illustrates how traditional values were shaped to accommodate the changing economy:
>
> I lived with my uncle for several years, and I recall his advice many, many times. His were wise words and they were handed down to me. He would say time and time again, not only when necessary, but to remind me I think, "if you work only for money you will never keep it, but if you divide your time equally gathering food, your money will be saved. If you worked on food and put aside a portion of whatever you put up, soon this will add up. The time will come when you will feel you have enough to take to another town and exchange it with whatever you feel is a good exchange. This way you will be surprised at how much you will gain in no time." Maybe there will be moments when you will be offered fur and you will take it because this adds up in a hurry. It is surprising what food will bring and once you realize this, you will continue to work on subsistence living. This is important, I sometimes wonder if it does not actually become more important than working for money. Times and methods may have changed but this applies fundamentally to any young life (Tape 6) (Newton & Moss, 2009, 3)."

Billy James statement about a good harvest year:

> **"This was the way of life in those days, no laws to dictate saying, you may only take so much.** This was what our people enjoyed for hundreds of years. One thousand fish was a lot of fish even then, but it also gives everyone satisfaction and security as most of the food may be exchanged for staples, such as potatoes and other items not available otherwise. Some were exchanged for money and this, in turn, was spent for staples, like flour, coffee, etc. This was subsistence living as I remembered, that was a very good year (Newton & Moss, 2009, 9)."

One last critical value that is tied to Haa Atxaayi Haa Kusteeyix sitee involves the strict laws Tlingit, Haida and Tsimshian people adhered to in regard to treatment of food, food conservation and proper use of resources. All three nations had many stories of what happened to their people who did not treat food with respect, did not appropriately use all of the resources and did not follow the cultural protocols required when harvesting the food. This law of full utilization, respect, and stewardship can be both a point of reference for management decision-making, and also another reason for Tribal people who know

and practice these laws to be looked to as the stewards of their lands. It is important to recognize that this traditional law of 'do not waste' conflicts with current harvesting laws from the State of Alaska, which do not permit keeping fish and game under certain sizes or outside of certain seasons, even if the animal or fish is already dead. For example, it is illegal to keep a king salmon under 28". Even if one catches a king salmon that is dead by the time it is reeled in, but it only measures 27.5", the salmon cannot be retained.

E. Traditional Way of Life tied to Place: Homelands

Food, Indigenous language, and the tie to their traditional homelands are all components of the way of life for the Tlingit, Haida and Tsimshian. The value system described above, stories, clan laws of ownership, place names, and the relationship to everything in their homelands illustrates how Indigenous people have built a way of life specific to Southeast Alaska.

A component of Indigenous homelands worth deliberate Forest Service planning and attention is the significance of Indigenous place names. Tribes have stated that Indigenous place names should be utilized on maps, interpretive signage, planning documents, and in as many places as possible. This gesture offers a sign of respect for the real names on the lands that have been there for thousands of years, respect for the relationship that it defines with Native communities and Tribal people, and allows for a greater ability to utilize the Indigenous knowledge embedded in place names. **The Forest Service plays a significant role in both the food lifeways and connection to homelands that the Tribes throughout Southeast prioritize. The Tribes have consistently requested that the Forest Service take the time to understand how their management practices can both benefit and restore their ways of life, or imperil them, as some history has shown.** As will be stated many times, this understanding of history offers the best starting point for relationship building, designing mutually beneficial co-stewardship and co-management structures, all while allowing a shared vision of success and health for the Tongass to be co-created.

This statement from Sergei Kan's Sharing Our Knowledge: The Tlingit and Their Coastal Neighbors (Kan, 2023) offers a new framework to round out this introductory **understanding of the Tongass as an Indigenous place.** Understanding the Tongass as the homelands of the Tlingit, Haida, and Tsimshian people, and the intimate connection that they feel towards it, lends an understanding as to how stewardship of the Tongass over 10,000 years helped cultivate and preserve the abundance that still exists today.

> "Thornton's description of the 3 R's as an educational foundation for understanding places; "first is **'resilience'** as linguistic artifacts, place-names are remarkably resilient" we hold them in our minds and they help us remember critical contexts of physical geography, events, and experience, from historical episodes to the location of critical fish wildlife, and plant resources. Second is the remarkable **resonance** that native place-names exhibit as potent signifiers of identity, relationships, and belonging. This in turn engenders the third "R," **respect. For if you feel a social, economic, political, spiritual, and emotional sense of belonging to a landscape, you tend to respect it, you tend to take care of it.** The land is not just your commodity or a stock of resources; you are intimately related to its places, and they to you (Kan, 2023, 367).

F. Haida History Within the Tongass National Forest

The Haida people of Southeast Alaska, described in ethnographic and historical literature as the Kaigani Haida, have held deep ties to the lands and waters of what is now known as the Tongass National Forest since time immemorial. The Haida people originated from the island of Haida Gwaii in present-day British Columbia, and permanently settled in Southeast Alaska in the late 18th century. However, oral

history and anthropological research have documented a much longer history of migration and interaction with the lands and waters of Southeast Alaska, as well as contact with Tlingit clans in the region that predates the permanent settlements of the 1700s (Moss, 2008). It is likely that the Haida traveled, fished, and traded, and intermarried with the Tlingit for thousands of years prior to these more recent settlements, demonstrating the pattern of gaining of lands and losing of lands that has occurred since time immemorial.

In the late 18th century, a group of Haida people began migrating to Southeast Alaska to build permanent settlements. This migration was motivated by a variety of factors, including conflicts with other Indigenous groups, diseases from Western contact, and the search for new territories rich in resources. By the early 19th century, the Haida had established significant settlements on the southern reaches of Prince of Wales Island and the surrounding areas, integrating themselves into the ecosystems of the Tongass National Forest.

Hydaburg and Kasaan, located on Taan (Prince of Wales Island) are the two surviving Haida communities in the United States. The village of Hydaburg, home of the K'iis Xaadas, was established in 1912 through the consolidation of several smaller Haida winter villages, including Howkan, Klinkwan, Koianglas, and Sukkwan. These communities moved to modern-day Hydaburg in an effort to gain access to a government school and consolidate resources after a smallpox epidemic decimated the Haida population in these communities. Hydaburg Cooperative Association (HCA) is the federally recognized tribal government of the Haida people in Hydaburg. Kasaan is home to the other half of the Kaigani Haida, the Kas'aan Xaadas; the town was created when Old and New Kasaan merged. Kasaan's traditional territory stretches from Thorne Arm to Cape Chacon. The Organized Village of Kasaan represents the Tribal citizens of Kasaan.

A. Traditional Values and Governance

The Haida people are organized in matrilineally-organized clans divided between Raven and Eagle lineages. Clan relationships and position influence many aspects of life, including leadership, marriage, property, and cultural responsibilities. Some of the most important property rights that follow lineage were the salmon streams and surrounding lands. These ownership rights were asserted and confirmed through potlatch ceremonies, where the host lineages invited their opposite clans to feast, give gifts, and conduct ceremony and dance with them. Their guests would then reciprocate in order to maintain their own social standing and property rights. This cultural practice served to reinforce property claims and use, and confirm the understanding of these claims and use amongst others outside the clan.

> "Territories and streams were under the ownership of lineage and house leaders who controlled access and use of the streams. They were also trustees responsible for insuring (sic) the continuing productivity of the systems they controlled. Members of lineages and houses utilized the streams in their territories or obtained authorization from lineage and house leaders to use other streams. Traditional ecological knowledge presented at the Hanna hearings in 1944 identified the customary and traditional owners of territories, and in particular sockeye streams, in the late 19th century. These ownership rights were recognized by the early Euroamerican commercial salmon industry developers" (Langdon, 2009, 122).

B. Use of the Forest and Marine Resources

Traditional subsistence activities, including fishing, hunting, and gathering, are deeply intertwined with Haida culture. Salmon have been at the heart of Haida subsistence and cultural practices for thousands of years. Salmon streams throughout the traditional territories of the K'iis Xaadas and the Kas'aan Xaadas have provided food and supported cultural activities such as potlatches and ceremonial feasts. The Haida

developed sophisticated technologies for harvesting salmon, including the use of stone fish traps, weirs, and spears. Harvesting methods and the practice of transmitting them reflect both an intimate knowledge of local ecosystems and a deep respect for the salmon as a vital resource for human and cultural sustenance. The Haida also harvested many other resources from the lands and waters, detailed further in Section VIII. Natural and Cultural Resources.

The Haida also utilized the vast timber resources of the Tongass for traditional carving practices. Old-growth western redcedar, in particular, is crucial for the creation of totem poles, canoes, and other ceremonial objects. The growth range and ecological suitability of this species meant that many of these trees were best suited to grow abundantly in Haida territory, i.e. the southern half of Prince of Wales and Haida Gwaii. Totem poles serve as cultural markers, telling stories of lineage, history, and the Haida's connection to the land. Canoes were essential for transport across the region before the industrial age, and were highly-valued trade objects. However, the availability of large cedar trees has diminished over the years due to high demand from the timber industry, and today the community advocates for the preservation of remaining old-growth stands for cultural use.

C. Cultural Stewardship Practices and Traditional Ecological Knowledge

Central to Haida stewardship is values of balance and reciprocity with the environment, informed by Traditional Ecological Knowledge (TEK), which has been passed down through generations. TEK informs the Haida's practices in managing resources sustainably, particularly their management of salmon fisheries. Elders and cultural experts maintain detailed knowledge about the timing of salmon runs, habitat conditions, and the relationships between salmon and other species in the ecosystem. Dr. Stephen Langdon and Robert Sanderson (2009) have documented a wealth of TEK regarding salmon stewardship practices in Hydaburg's traditional territory.

The Haida's stewardship practices extend beyond salmon to the forest ecosystems as well. The community places high importance on protecting forest health, managing timber resources carefully, and advocating against clear-cutting practices that degrade the landscape. The community of Hydaburg has implemented a 20-year community development plan with a focus on environmental protection and sustainable resource management, reflecting their ongoing commitment to ecological stewardship. Hydaburg and Kasaan both experienced a high level of timber harvest in their traditional territories from the 1960s through the early 2000s. Hydaburg and Kasaan tribes have been heavily engaged in advocating for long-term stewardship and access to the cultural use trees in their traditional territories, as detailed later in this document.

D. Contemporary Challenges and Adaptation

Rising sea levels, shifts in seasonal patterns, and changes in marine ecosystems are all affecting the availability of key subsistence resources, particularly salmon. In response, the Haida are adapting their resource management strategies, blending TEK with modern scientific approaches. For example, Hydaburg Cooperative Association has used Fisheries Resource Management Program (FRMP) funding agreements with the Forest Service and the Office of Subsistence Management to collect data on sockeye salmon in Hetta Lake and Eek Lake systems. They also count returning fish for escapement estimates and collect subsistence harvest estimates for all their sockeye salmon systems in Cordova Bay. This data is used by the Alaska Department of Fish and Game to make in-season management decisions regarding when and where to open commercial fisheries for pink salmon in the bay, to avoid sockeye interception during peak run timing or when low numbers of sockeye are returning to these systems. In addition to supporting technical data collection, the FRMP program has historically been used to document vast amounts of traditional ecological knowledge (Langdon & Sanderson, 2009).

Additionally, the decline of the timber and fishing industries in Southeast Alaska has led the Kasaan and Hydaburg to explore new economic opportunities, such as eco-tourism and the production of value-added seafood products. Organized Village of Kasaan has made significant infrastructure and staffing investments into their ecotourism program, offering guided tours of a totem park and a traditional longhouse, cabin rentals, and a cafe. These efforts aim to create a more sustainable and self-sufficient economy, rooted in Haida cultural values.

G. Tsimshian History Within the Tongass National Forest

Tsimshian means "people inside the Skeena River," and refers to a tribe of Indigenous peoples that neighbored the Gitxsan and the Nisga'a peoples along the Skeena and Nass Rivers, in what is now Northern British Columbia (American Museum of Natural History, n.d.). Although their roots come from modern-day Canada, the Tsimshian people have a history with the land, seas, and other Indigenous clans of Southeast Alaska that predates the creation of the Tongass National Forest, the border between Canada and the United States, and even the concept of the nation-state. For thousands of years, Tsimshian people fished, traded, fought, married, and celebrated from Yakutat Bay to the Columbia River, along with the Tlingit, Haida, Eyak, Nisga'a and Gitxsan people in the area. This long history of interactions is evidenced through oral histories and the variety of Tsimshian family names scattered throughout Southeast Alaska, as families intermarried and clans went to war and traded goods up and down the coast. For example, oral history documents that the "Shakes" name, a title used to denote a series of distinguished clan leaders originally in the Wrangell area, is a Tsimshian word that the Naanya.aayi clan claimed, along with the use of the Killer Whale symbol, after a fierce war with Tsimshian tribes (National Park Service, 1970 and D. R. Boxley, personal communications, September 17, 2024).

In modern times, Tsimshian territory is commonly conceptualized as the Metlakatla reservation on Annette Island. In 1887, 823 members of the Tsimshian community, originally hailing from what is now known as British Columbia, migrated to Annette Island under the leadership of missionary William Duncan and established a community called New Metlakatla. However, it is important to situate this most recent chapter of migration and subsequent settlement in Southeast Alaska in a much longer history of trade, marriages, conflict, and engagement with the other Indigenous peoples in the region that spans over 10,000 years, before the concept of a nation-state and lines on a map ever existed.

The Tsimshian people organize their clans into four phratries: Gisbutwada (Killer Whale), Laxgyibuu (Wolf), Laxsgyiik (Eagle), and G̲anhada (Raven) (American Museum of Natural History, n.d.). The Tsimshian language, Sm'álgyax, is still spoken in Metlakatla and in Canada. The language is completely unrelated to Lingít (Tlingit) and Xaat Kíl (Haida) languages, and originated on the Upper Skeena River near modern day Hazelton in Northern British Columbia. The language and the people migrated down the river "after the flood"; flood stories were oral histories that describe how clans moved about the region and occupied new territories during glacial melt periods of the Little Ice Age some 11,000 years ago (D. R. Boxley, personal communications, September 17, 2024). As with the other Indigenous inhabitants of Southeast Alaska, the Tsimshian people were semi-nomadic and conducted a great deal of harvesting and trading throughout Southeast Alaska. In addition to resources, Tsimshian songs and names were also given through marriages, celebrations, and potlatches to settle disputes.

Migration to Annette Island

In British Columbia, the community of Metlakatla, or Maxłaxaała (saltwater passage) in Sm'álgagyax, is an ancient winter village site that had been occupied by the Tsimshian people for thousands of years. However by 1834, most of the Tsimshian tribes in the area were based out of Lax Kw'alaams, formerly Port Simpson, B.C. In 1862, the Anglican minister William Duncan arrived at the site and created a

Christian community with some 350 Tsimshian people from Lax Kw'alaams, who had followed him up to Metlakatla. The decision to move to Alaska came shortly thereafter, and was largely motivated by the desire to establish a new life free from colonial and religious pressures of the Church of England and the Canadian government.

In 1887, some eight hundred Tsimshian people and Duncan embarked on a canoe journey across Dixon Entrance in search of a new home. A scouting party explored as far north as the Stikine River before identifying Annette Island as a suitable site with abundant salmon, animals, calm bays, fresh water, and trees (Murray, 1985). The island contained the remains of another Indigenous settlement that had existed until fifty years prior. The inhabitants fled to Ketchikan after being attacked by a tribe of Tlingit people; only one Tlingit man and his family remained in what would become New Metlakatla. The Tsimshian people spent the summer building temporary homes, while the missionary William Duncan traveled to Washington D.C. to petition President Grover Cleveland and Congress to give the lands to the group for the establishment of a new community. The petition was successful and on August 7th, 1887 the community celebrated its first 'Founders Day,' a tradition that continues today. In 1891, an act of Congress created the Annette Islands Reserve for the "use and occupancy of the Metlakahtla Indians and those people known as Metlakahtlans who have recently emigrated from British Columbia to Alaska, and such other Alaska natives as may join them (Act of March 3, 1891. Ch. 561, § 15, 26 Stat. 1101, 1891)." This marked the first time that the reservation system was used in Alaska.

The Tsimshian of Metlakatla maintained their traditional societal structures despite the influence of Father Duncan's missionary teachings, preserving their clans and their language until the Bureau of Indian Affairs outlawed the speaking of Sm'álgyax in 1915. However, colonial agreements disavowed traditional practices such as potlatches, shamanism, and secret societies. A cultural resurgence began in the late 20th century, with the first potlatch held in 1982, marking a significant moment in reclaiming Tsimshian heritage.

Economic and Political Development

From the early days of the settlement, the Tsimshian people strove to build a self-sufficient community, with a sawmill, cannery, and churches. The sawmill was crucial to the town's economy and growth as it processed all the building materials from the forests near the town. However, these early times were not easy and some families returned to Canada or left the island for Ketchikan. One such emigrant was Peter Simpson, a prominent Tsimshian leader, who founded a sawmill on Gravina Island. His subsequent involvement in Alaskan politics led him to become a founding figure in the Alaska Native Brotherhood and one of the thought leaders of the battle for Alaska Native land claims in the early 1900s that culminated in the passage of the Alaska Native Claims Settlement Act (ANCSA) in 1971 (see VII. Existing Tribal Rights).

Metlakatla was the only reservation in Alaska that chose to keep their reservation status and opt out of the ANCSA system. Instead of receiving a payment and the means to create a village corporation and participate in a regional corporation, Metlakatla chose to maintain their federal reserve that had been created by Congress in 1891. This meant that the Tribe retained title to and sovereignty over the 86,000 acres on the Annette Islands, the waters 3000 feet off the coast (granted in 1916), and their hunting and fishing rights on these lands and waters (Brooks, 2021).

The decision to opt-out of ANCSA was not easily reached and stimulated bitter debates between the inhabitants of Metlakatla. At the time of ANCSA's passage, Tribal sovereignty had a different legal interpretation, and the Bureau of Indian Affairs often took the role of principle governing power on reservations. This dichotomy was experienced in Metlakatla when Ketchikan Pulp and Paper Company (KPC) came to the island and leased the town's sawmill and the BIA-managed forest land for logging,

leading to a period of intensive clearcutting in the 1980s and 1990s that mirrored the conglomerate's practices in other parts of Southeast Alaska (Alaska Forest Association, n.d.). Logging played a significant role in Metlakatla's history, with substantial activity taking place during the 1980s and 1990s. Clearcuts, often out of the control of the community and of great concern, have left a lasting impact on the landscape. While the island retains small stands of old-growth red cedar—highly prized for totem poles and traditional canoes—the community now faces challenges in accessing these cultural resources that mirror the challenges other Tribes confront across the Tongass National Forest.

Cultural and Environmental Stewardship

Stewardship of the land has been central to the Tsimshian way of life for thousands of years. Traditional ecological knowledge, a deep respect for the land, and an integration with Western science and monitoring methods guides the community through the management of their natural resources and claims to fishing rights.

The Tsimshian share a holistic worldview where the health of the natural resources that they depend on are intrinsically intertwined with the health of their own communities. Like all other Northwest Coast cultures, the Tsimshian people consider salmon to be a keystone species for meeting their community's nutritional, cultural, and economic needs.

> As community member Thomas Hanbury described in 1917, "The Natives Inheritance is Salmon Fishing. I am one of the thousand native parents of Alaska. We know the salmon. No one is more competent to judge salmon; it was the inheritance from our fathers, and salmon has always been our bread, and our skill and our boat, and net or line, [it] is the only inheritance we can leave to our children. Salmon Fishing [is the] only Inheritance to pass [on] to Native[ ] Children. I look into the uncertain future to that only inheritance I can leave my children. To me this subject is sacred and greater than life itself. When the salmon fisheries are exhausted, God only knows what will become of my children and my people (Metlakatla Indian Community v. Dunleavy, 2020)."

Metlakatla's relationship with the surrounding environment, including the waters of Southeast Alaska, remains a point of both pride and contention. A recent court case between Metlakatla Indian Community and the State of Alaska is focusing on fishing rights in the waters around Annette Island reflects the community's ongoing struggle to retain control over their traditional fishing practices. The Tsimshian of Metlakatla are not claiming aboriginal rights, but rather asking for the congressional rights granted to them upon their settlement. Despite opposition from the state, the community remains resolute in protecting its rights as a fishing people. The dispute centers around fishing that usually occurs within a day's travel from Metlakatla, which encompasses a vast array of salmon runs that originate from habitat within the Tongass National Forest. Maintaining healthy salmon habitat within the Tongass National Forest is therefore of utmost importance for the Tsimshian people and the community of Metlakatla

History of Government Actions Regarding the Tongass National Forest

President Theodore Roosevelt signed Presidential Proclamations in 1902 and 1907 that established the Tongass National Forest without consulting Southeast Alaska Natives. It is a critical starting point for agency staff working on the Tongass to understand the generational trauma that federal policies and practices have caused. This sentiment is often the starting point when engaging with Tribes, who have endured generations of broken promises, discrimination, disenfranchisement and dispossession. Understanding the history of the federal governments actions, including those of agencies beyond the Forest Service, is an important place to start repairing trust.

This section is meant to provide a short history of a few of the impacts that the actions of the federal government, including agencies beyond the Forest Service, have had on the Tlingit, Haida, and Tsimshian people and Tribes of Southeast Alaska. This following list is not conclusive, but rather a precursory introduction to a few notable examples. These include naval bombardments of the Native Villages of Angoon and Kake in the late 1800s, forcible separation of families and suppression of Indigenous culture and language through the boarding school system in the late 1800s up until the 1970s, denial of Native Allotments to Alaska Natives who followed the legal process to obtain land rights, and other harmful actions.

A. The Removal of People from their Homelands and Community Consolidation

Current communities that exist in Southeast Alaska are consolidations of many smaller villages, which served as both seasonal harvesting locations and permanent winter villages. A variety of factors and actions removed Indigenous peoples from their homelands, destroyed harvesting infrastructure and traditional teaching systems, and led to community consolidation during the 1800s and 1900s that weakened Alaska Native peoples ability to claim aboriginal rights to their lands and practice their way of life.

For example, modern-day Yakutat includes clans that have been consolidated from Dry Bay to the South and the Kalyik river to the North. Hoonah is a consolidation of many village sites that extend north into Glacier Bay and Lituya Bay, to the Inian Islands, to the mainland shore of the Chilkat peninsula and additional locations on Chichagof Island. It was established sometime in the 1700s after a glacial expansion event swallowed Huna kwáan homelands in what is now known as Glacier Bay. Communities including Juneau and Skagway, saw clans living in and around these areas when mining resources were found, which caused huge influxes of spectators seeking to strike it rich. The introduction of large populations of settlers and the development of modern infrastructure to meet these economic booms resulted in Native people being removed from their land through policy and actions, such as the burning of the Douglas Indian Village in 1962 (Douglas Indian Association Council, 2017).

Other reasons for community consolidation were necessitated by government policies, economic needs, church and school systems, and significantly by the creation of the Tongass National Forest and Glacier Bay National Park. The clans that came together to consolidate into a community were often promised infrastructure development like clinics and schools. However, these promises were not always fulfilled. The historic village sites are still very important to the Tlingit communities, with many Tribes and clans holding reburials, culture camps, healing trips and clan gatherings at these sites. Most of these sites can be classified as sacred sites whose specific location and site details can be public or kept private (see VI. Current 2016 Tongass Land Management Plan Direction). The loss of many of these sites is a significant part of the pain that communities feel towards governmental action.

As families relocated from summer fish camps to larger communities to provide for their children to go to school, the semi-nomadic and seasonal lifestyle began to disappear, impacting that generation's cultural education and their ability to pass on harvesting skills and traditional ecological knowledge. Richard Newton and Madonna Moss (2009, iv) describe some of the impacts that education mandates had on the traditional way of life:

> "In transition to the modern day, laws required children to attend school. This was good, and encouraged children to learn things about the world. But parents could not take children out of school, and attendance at traditional "places of higher learning"—the bays and fish streams and mountains—was limited to summer vacations. At school, and in the larger towns and cities, the

younger Tlingit began to partake in Western ways and in the cash economy. More money was needed to survive, more money than one could make living in the villages."

Place names and the critical traditional ecological knowledge that they contained were lost as Indigenous languages were prohibited and punished at boarding schools. Trauma grew within many communities, and was passed down through generations, negatively impacting community cohesion and the ability of the Tlingit, Haida, and Tsimshian societies to practice their culture and way of life. In addition to other actions taken by the federal government to decrease access to traditional harvesting infrastructure, growing dependence on a cash-based economy further separated people from traditional lifeways. This statement from Sergei Kan's Sharing Our Knowledge: The Tlingit and Their Coastal Neighbors (2023, 364) illustrates how the church and school nexus, supported by the federal government, worked to dismantle cultural reproduction and traditional knowledge systems:

> "Lived memories are long [...] Missionary imperatives to "Civilize" and assimilate Natives. . . meant not only ignoring Native ways of knowing, but actively undermining them so they did not threaten socialization into the dominant value systems. Thus Alaska Natives were forbidden to speak their own language – the lifeline of cultural reproduction – **and even were taken from their home communities – the nexus of place-based education – in the service of assimilation goals**. (Kan, 2023, 364)"

B. Efforts to Establish Reservations

With the exception of Metlakatla, tribes in Alaska do not have reservations, although there are multiple previous attempts at establishing them. An example is Hydaburg, which twice achieved a reservation designation, both of which were rescinded. The Haida villages of Sukkwan, Howkan, and Klinkwan consolidated into present day Hydaburg, which became Hydaburg Indian Reservation in 1912. The United States Federal government revoked their reservation status in 1926. In 1927, Hydaburg became the first village to incorporate as a City under the Alaska Territorial Government. In 1936, the Hydaburg Cooperative Association was formed as the first Indian Reorganization Act council in Alaska. Then the tribe petitioned for 800,000 acres of land and water to be established as a fisheries reserve based on aboriginal territorial rights in 1939. While the effort was unsuccessful, it did open the door for Alaska Natives to petition for reservations in 1941. In 1945, it was determined that the Hydaburg Haidas had unextinguished aboriginal rights to approximately 10% of their original claim from the fisheries reserve petition and in 1949 Hydaburg was granted reservation status on 101,000 acres, including water rights. Kake and Klawock were part of these hearings about the protection of fisheries in their communities as well, and had 95,000 acres (Klawock) and 77,000 acres (Kake) set aside in addition to Hydaburg's acreage. A subsequent court case to cause cannery operators to cease operating their fish traps inside the boundaries of the Hydaburg reservation led the court to rule that the reservation was illegally formed, and the Hydaburg reservation status was revoked for a second time in October of 1952 (Langdon, 2004).

During this period, was the Forest Service's policy and practice to oppose the creation of reservations in the Tongass National Forest, as the agency did not recognize aboriginal title or claims of traditional land use and hunting, fishing and gathering activities (Baker et al., 1995, 28). In 1948, the Forest Service expressed their support of the Senate's efforts to repeal the authority of the Secretary of the Interior to establish reservations in Alaska. In part, this opposition to Native land claims stemmed from the agency's efforts to create a pulpwood industry in Southeast Alaska, which was dependent on a supply of trees that came from the lands around these villages. This is demonstrated by agency that the testimony gave to a Congressional Committee in 1954, stating that Indian claims "based largely on hunting, trapping, berry picking, fishing, firewood cutting, and other highly transitory and nomadic use by the Indians or their

forebears inject a large amount of uncertainty into the prospective development of the pulp and paper industry in southeastern Alaska based on national forest timber (Baker et al, 1995, 29)."

C. The Burning of Smokehouses and Fish Camps (1930s-1960s)

Permanent winter camps were typically located in areas protected saltwater areas with drinking water and good canoe landings, and were usually. These locations usually provided access to fish bearing streams by canoe and other areas for hunting and gathering. Generally, clan houses would host 20-50 people and a winter village size ranged between 300-500 people.

In addition to permanent winter villages, Tlingit, Haida and Tsimshian families had seasonal fish camps. **Importantly, fish camps and smokehouses signified the most valuable property Indigenous peoples had, as they were situated along fishing grounds or salmon streams which individual clans owned and passed down through the generations.** Smokehouses were often associated with summer fish camps, although they are also known to be in high use areas that may also accommodate hunting. Smokehouses were used to smoke, cure and dry preserve fish and game. Fish camps were seasonal, where a whole family would move from the village to the camp in order to harvest and preserve an abundance of foods to store for use through the winter. From Haa Atxaayi Haa Kusteeyix sitee, Our Food is Our Tlingit Way of Life (Newton and Moss, 2009, 5):

> "Fishing was of utmost economic importance to the Tlingit. The products of the hard work at fall dry fish camps sustained the Tlingit people through the long, wet winters of Southeast Alaska. Dry fish were critical to survival, and members of the extended family worked long hours to put up the winter's supply. **Each family group or clan had their own salmon stream and fish camps were located nearby.** The Tlingit people held special regard for the fish and this is expressed by Lydia George:
>
> One person was delegated to be responsible for the fish. Every day, he watched the ocean beach for fish jumps and kept track of all movements of the fish. No one was allowed to kill fish before they came upstream to spawn, they believed if the fish was bothered and disturbed during their migration upstream to spawn, they would turn back and go up another river. Since fish was our main food, we were very careful; the fish were treated well. If a man broke any of our laws, his fishing equipment was taken from him; sometimes his spear was broken up."

The presence of fish camps and smokehouses gave credible evidence to Native land claims, which the Forest Service actively opposed after gaining authority over the Tongass National Forest in 1907. While it is unclear whether the burning of smokehouses and fish camps was a written or unwritten policy, there is no disagreement that it occurred.

> "Although Rakestraw reports only one dispute between the Forest Service and Indians seeking to use the Tongass in a customary and traditional manner, conflicts were common since Forest Service personnel sought to protect the forests from specified public and private uses, while Tlingit Indians sought to continue their use of the coastal region for hunting, fishing and gathering. Tlingit residents reported that during the first half of this century, it was a common practice for Forest Service personnel to burn Indian cabins, trolling poles, and smokehouses to discourage Indians from entering upon and using land within the Tongass National Forest. According to statements made by K.J. Metcalf (retired Admiralty Monument Manager), this continued in the 1960's, where it was unofficial policy to remove as many smokehouses and what they would call abandoned structures as possible to eliminate land-use problems by burning them down (Baker et al. 1995, 29)."

At the request of Tribes and through conducting interviews with Alaska Native people, there is now considerable written and oral documentation regarding how the U.S. Forest Service and National Park Service burned down smokehouses and fish camps across the Tongass National Forest and Glacier Bay National Park. Goldschmidt and Haas' Haa Aani Our Land: Tlingit and Haida Land Rights and Use (1998) included several interviewed references. The Forest Service published an investigation conducted by their Tribal Relations specialist, John T. Autrey, and assisted by Angie Lammers in 2007 ahead of an official apology for these actions in 2008. Autrey & Lammer's report, titled Preliminary Investigations into the Degradation of Traditional Native Subsistence Camps and Smokehouses near the Village of Kasaan, Alaska during the 1940's and 1950's, accounts for how management actions within the federal government forcibly dispossessed Kasaan's land rights by degrading their claims of traditional use. Autrey & Lammers (2007) included an excerpt from Langdon (2004) stating: "In every community I have visited, numerous elders have told me of the destruction of the structures their families had used for decades if not longer at their subsistence sites." Autrey (2007, 10) concludes, "the testimony of Elders and former Forest Service employees clearly state that there was a practice of burning down smokehouses and fishcamps during the 1930's, which continued into the 1960's, at Kasaan and other locations within the Tongass National Forest."

In 2018, Vivian Prescott summed the generational effects this has had:

> "I think about what our smokehouse means to us and to our family, to the generations to come, and how my children's ancestors' smokehouses were once deemed "illegal." After WWII, the government, acting as the Forest Service, burned or tore down any "unused" cabins and smokehouses from federal land. Those cabins were not abandoned, though, but were summer fish camps. They considered those families as trespassers, despite having fished there since time immemorial. Smokehouses were proof of clan ownership, proof of a thriving culture that depended on salmon. Often the colonizers saw an old smokehouse and assumed it was abandoned. My children's relatives, in recent memory, had to deal with this. Throughout the 1930s, '40s and '50s, the government destroyed many of the smokehouses and fish camps in Southeast Alaska."

This history offers an opportunity for reciprocity within the Tongass Forest Plan with a need for change that builds understanding of the full history of the consolidation of Indigenous communities and loss of harvesting access within their homelands. The Forest Service should integrate indigenous harvesting infrastructure more broadly into land use designations, based off of Tribal consultation and request. Within the Tribal engagement process, Tribes mentioned specific items they would request be available for Tribes to manage within their traditional territories, such as warming shelters and smoke houses. Co-stewardship with Tribes can also be a pathway to rectifying the loss of "ways of life" caused by past Forest Service actions.

D. Ongoing Challenges to Tribal Relations

Inadequate Consultation

As per FSM 1563.01c, the federal government is required to consult with Tribes and Alaska Native Corporations "when a Federal action may have substantial direct effect on an Indian tribe's interests," which "may be defined by the Indian tribe's perspective." E.O. 13175 "Consultation and Coordination with Indian Tribal Governments," issued November 6, 2000, directs Federal agencies to establish regular and meaningful consultation and collaboration with Tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes. Policies that

have tribal implications include regulations, legislation, policy statements or projects that may affect tribes.

Tribal consultation, grounded in a government-to-government relationship, is different from regular communication that a Tribe and the Forest Service might engage in to collaborate on a project or exchange data and ideas. Consultation is a process for official communication between a tribal government and the federal government. Effective tribal consultation involves a free flow of information and ideas which emphasize trust, respect and a shared responsibility between the two entities. Meaningful consultation means having the opportunity to affect the outcome of an action.

The intention of consultation and how it is implemented in practice are not always in alignment. Tribes have described the process of consultation with the Forest Service as inadequate and at times disrespectful. The 2020 Petition for a Traditional Homelands Rule (5) states:

> "The failure to include our input or address our concerns in the Alaska Roadless Rulemaking process amounts to the collective disenfranchisement of our sovereign Tribal governments. [...] the recommendations made by Tribal Governments through these [consultation] processes are only advisory, and the government-to-government discussions are non-binding. Thus, Tribal Governments do not actually have the rights to manage and protect traditional and customary uses on their traditional homelands. This has resulted in a one-way system of communication in which the federal government engages in 'consultation' as a way to issue orders and give updates to the Tribes about what will happen in decision- making processes, while ignoring the recommendations that the Tribes provide. **This consultation structure is the product of an unjust system in which Native culture is not respected, and Native people are not given a voice in the decision-making processes that affect how we practice our traditions and culture.**"

One of the core demands of the 2020 Traditional Homelands Conservation Rule Petition related to improving the consultation process:

> To address our concerns about the inadequate consultation process we request that, as part of this new rulemaking process, the USFS should engage in a robust and legitimate government-to-government consultation process with the Tribes on the Tongass National Forest under the principle of "mutual concurrence" to identify traditional and customary use areas and design forest-wide conservation measures to protect them in all USDA decisions involving the Tongass. "Mutual Concurrence" as defined in the Forest Service Manual (FSM 1509.13, Chapter 10: FSM 1563.03(3)(e), shall apply to all types and modes of future USFS consultations: "consultation only occurs when the office or Agency and tribal officials mutually agree that consultation is taking place."

Consultation does not occur early or often enough to be fully engaged, collaborate and build trust in between subsequent formal consultations on specific actions. Early and often engagement would also ensure that internal federal staff and preliminarily ensure that tribal and other considerations are thought about from the beginning of a project or action.

Cooperating Agency Status and Process

Under the National Environmental Policy Act (NEPA), any lead federal agency has the ability to engage "cooperating agencies" that have jurisdiction by law or special expertise with respect to any environmental impact involved with a proposed project. This includes Native American/Alaska Native Tribes when the environmental effects occur on lands of tribal interest. Cooperating agencies take on a

degree of authority, responsibility, and involvement in the environmental review process, and per 40 CFR 1501.6, a distinguishing characteristic in regulation permits a cooperating agency to "assume on request of the lead agency responsibility for developing information and preparing environmental analyses including portions of the environmental impact statement concerning which the cooperating agency has special expertise."

The most recent instance where Tribal governments were invited to participate, and accepted, as a cooperating agency on a Tongass National Forest NEPA process was during the Environmental Impact Statement for the Alaska Roadless Rule from 2018-2020. Six Tribes signed on as cooperating agencies, and had meaningful input into evaluating how the alternatives developed may or may not be acceptable around each Tribe's traditional territory. While some Tribes opted for a no action alternative, others were able to find compromise within the alternatives as long as protective measures around their communities were taken into consideration. Unfortunately, the lead agency chose the most extreme alternative to pursue that was not supported by any of the Tribes in the region. This disregard of Tribal input, priorities and concerns resulted in all six Tribes unilaterally pulling out of their cooperating agency role and not supporting or signing the final NEPA document.

Current 2016 Tongass Land Management Plan Direction

This section details the existing guidance and management frameworks provided by the 2016 Tongass Land and Resource Management Plan (2016 Tongass Forest Plan) for the areas, natural and cultural resources important to Tribes, as well as how this framework inadequately captures Tribal perspectives. Although the Tongass Forest Plan was amended in 2016, most of the plan was written in 1997, before the 2012 Planning Rule was created. Consequently, there is a significant lack of tribal input and perspective into the existing plan, both the 1997 version and the amended 2016 version. As such, there is also a lack of consideration for the long-term health of the cultural resources that the tribes depend on. Tribes on the Tongass would describe all "natural resources" that the Plan manages as cultural resources, given that their interactions with these resources supported their sustenance, survival, and the ability of their communities and cultures to thrive on this landscape for thousands of years.

Tribes have observed that the post-contact history of natural resource management on the lands of the Tongass National Forest and the waters that surround it has been defined by cycles of boom-and-bust resource extraction of different species. In the 2020 Redcedar letter, Tribes described this impacts of these actions, stating: "The post-contact period and subsequent colonialism in Southeast Alaska destroyed this careful balance that we cultivated over millennia. Our resources were plundered for quickest economic return, as we first saw the desecration of the sea otters followed quickly by our salmon, and then our own forest." In regards to some economic development activities on the Tongass, especially timber harvest and mining, Tribes have well documented their concerns about the adverse impacts of these activities on the resources that they depend on for their physical, spiritual, and cultural sustenance. In particular, industrial-scale clearcut logging is observed to have negatively impacted deer habitat, while mining poses contamination risks to salmon, seals, and other marine animals and invertebrates.

Definitions

The glossary in the 2016 Tongass Forest Plan provides a definition of "heritage resources" or "cultural resources" (used interchangeably), which is: "the physical remains of districts, sites, structures, buildings, networks, events, or objects used by humans in the past. They may be historic, prehistoric, architectural, or archival in nature. Heritage resources are non-renewable aspects of our national heritage. [...] Heritage resources are associated with sites of human activities or events" (TLMP 7-24). This definition focuses on tangible evidence of physical occupation by Indigenous people. However, by definition it excludes all the

renewable resources that Tribes depend on for the current and future survival and revitalization of their cultures.

Understanding the differences between a Forest Service perspective of cultural resources and a Tribal perspective is necessary to understand why Tribes declare that the current plan direction has failed to protect cultural resources and their access and continued use of said resources. As carver David R. Boxley (personal communications, 2024) stated, “25 years ago, 60 years ago, there was never any mandate from the USFS to provide cultural wood. The numbers of irreplaceable cultural logs lost over this time period was a tremendous taking from Tribes, Native artists and communities. It has coincided with a decline in the number of master carvers throughout Southeast Alaska. The remaining carvers question whether they will have access to suitable logs for even the next few years let alone logs available for the next generation.”

Heritage Resources

The 2016 Tongass Plan’s objective for heritage resources is to “protect heritage resources (as described in the Heritage Resources Forest-wide Standards and Guidelines)”, and “provide public outreach about heritage stewardship.” Forest-wide standards for heritage resources require that the agency maintain a heritage resource management program to identify, evaluate, preserve, and protect Heritage Resources in compliance with the National Historic Preservation Act, the National Environmental Policy Act, the American Indian Religious Freedom Act, the Archaeological Resources Protection Act, the Native American Graves Protection and Repatriation Act, their amendments and implementing regulations. Other forest-wide standards for managing heritage resources require the development of appropriate interpretive messages for heritage sites and activities and development of a heritage resource management assessment that provides a framework for decision-making. One standard for heritage resources requires that the agency “coordinate the management, access, and use of forest products to perpetuate Alaska Native culture and art forms,” such as old-growth redcedar and yellow cedar for carving and weaving purposes.

Sacred Sites

The 2016 Tongass Forest Plan contains the goal of “consult[ing] with Tribes to protect and maintain sacred sites Forest-wide”, with the objective being to “manage and protect sacred sites as an integral part of the landscape and land management planning.” The plan requires consulting with Tribes to protect and maintain sacred sites Forest-wide (Heritage Resources and Sacred Sites Standards and Guidelines section in Chapter 4).

The definition of sacred sites that the Forest Service uses is found in E.O. 13007: Indian sacred sites defined as “any specific, discrete, narrowly delineated location on Federal land that is identified by an Indian tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion; provided that the tribe or appropriately authoritative representative of an Indian religion has informed the agency of the existence of such a site.”

Some Tribes have emphasized that the definition of what is considered a sacred site is too restrictive. The definition requires the sacred site identification be provided by the Tribe, but the location of such sites does not necessarily need to be shared. Another concern expressed is that federal agencies don’t necessarily restrict public access to identified sacred sites. One example identified the public identification of sacred sites in the planning documents for some programs on national forest lands. Increased knowledge of sacred sites can increase the possibility of vandalism and desecration. Most Tribes wanted to see the agency protect sacred sites but were hesitant about sharing those sites because of

how that knowledge has been used. 'Early and often' engagement between the Ranger District and the Tribe can help ameliorate these issues.

Historical Sites

43 CFR 2653 defines historical place as "a distinguishable tract of land or area upon which occurred a significant Native historical event, which is importantly associated with Native historical or cultural events or persons, or which was subject to sustained historical Native activity, but sustained Native historical activity shall not include hunting, fishing, berry-picking, wood gathering, or reindeer husbandry. However, such uses may be considered in the evaluation of the sustained Native historical activity associated with the tract or area."

Alternatively, ANSCA subsection 14(h)(1) communicates that the tribes and ANCSA Corporations may apply to have cemetery sites and historical places withdrawn and conveyed to the appropriate regional corporation fee title to the site. The definition of historical sites under ANCSA 14(h)1 is modeled after the National Register of Historic Places, and provides a broader definition that may include abandoned villages, burial sites, various camps, forts and sites with petroglyphs or pictographs. However, it explicitly excludes subsistence harvesting sites, which are (46 CFR 2653). Sealaska Corporation has implemented policies for the management, access and use of 14(h)(1) historical sites. Congress has not yet conveyed all of the 14(H)1 sites to Sealaska. Sealaska has a history of working closely with the Tribes on management of the sacred sites they own within an individual tribes traditional territory. They have examples of management agreements for cultural and archeological work done at sacred sites that may be good examples to follow and coordinated management plans may be beneficial if a Tribe agrees it would be helpful. Coordinating around the best plan to uphold confidentiality of sacred sites that meat the Tribes wishes would also lead to better management planning with Tribes.

Alaska Native Graves Sites

Alaska Native peoples have varying types of grave sites throughout their traditional territory. These range from individual graves near family homes to cemeteries associated with village sites. In addition to grave sites, some deceased were burned and ashes were put in bentwood boxes which were then put into memorial totem poles. Many communities buried their deceased on islands adjacent to villages. Some tribes believed that once you buried your ancestors on the land, the land became your family's land. In Southeast Alaska 96 original applications for sacred sites were approved out of the over 800 that were documented under the ANSCA 14(h)(1) process; some of these included known gravesites. Sealaska received additional 14(h)(1) sites within their final land entitlement, the Sealaska Lands Bill. The Native American Graves Protection and Repatriation Act, passed in 1990 requires federal agencies to protect burial sites on federal lands. If remains are excavated or disturbed, the federal agency must treat the remains with dignity and respect and return them to the appropriate tribe.

Special Interest Areas

The 2016 Tongass Forest Plan, Appendix J, Special Interest Areas, identifies a cultural/botanical special interest area designation that was led by Native carvers in Kake. Sukkwan Island near Hydaburg was discussed as receiving a similar designation, but paperwork was never signed. Tribes have expressed increasing interest in these types of designations to protect productive cedar groves.

> "The North Hamilton River redcedar area is located on Kupreanof Island. It is an 80-acre stand of timber with a high component of red cedar. North Kupreanof is the furthest north where redcedar is present. It occurs only along the western side of Kupreanof Island as a minor component of the forest with a scattered distribution. This stand is unique because of the high proportion of

> redcedar it contains, which is unusual at this latitude. The stand was identified as being significant for subsistence and cultural uses by the native wood carvers of Kake in 1974, and the Hamilton River Timber Sale was modified to exclude the redcedar area from the sale. A high priority of the citizens of Kake is to set aside the redcedar grove for cultural and subsistence uses. This is the only redcedar in the immediate area that is easily accessible. The traditional uses of redcedar include carving, medicines, sewing materials and construction materials (2008 TLMP Appendix F-4)."

Traditional Cultural Property is another designation that has been used to document and protect areas of special Interest for Tribes. Chuck Smythe writes: The X'unáxi Traditional Cultural Property, or Indian Point, encompasses the location of the first Auk Tlingit Village in the Juneau vicinity. Chuck Smythe (n.d.) writes, "It is described by Tlingit people as a shamanic landscape due to the presence of shamans' graves and is considered a spiritual place and a ceremonial space used by contemporary Tlingit people. The area is a place to go for spiritual renewal, a place to acquire spirits, and where Tlingit people feed the spirits of their ancestors."

The village site is listed on the National Register of Historic Places as a traditional cultural property, which provides requires certain conditions to be met for documentation as such and provides a certain level of protection. Other national forests have used the TCP designation to protect larger cultural sites, and the Forest Service should work to make sure Tribes are informed of this designation for critical areas of cultural heritage (Chippewa National Forest, n.d.)

Existing Tribal Rights

Existing Tribal rights involving hunting, fishing, gathering and protecting cultural and spiritual sites are addressed differently in Alaska than they are throughout the rest of the continental United States. This disparity is due to several factors, including:

1. The absence of treaties and treaty rights;
2. Congress being given the task of dealing with Alaska aboriginal hunting and fishing rights;
3. Withdrawal of federal lands via presidential proclamation; and
4. The unique Alaska Native Corporation system that Congress created to address land rights through ANCSA; and
5. The creation of the Alaska-specific subsistence management system.

Today, 19 federally recognized Tribes on the Tongass do not own significant amounts of land, and do not hold treaties with the U.S. government. Treaty-making with Indian tribes was eliminated in 1871 by federal statute, shortly after the U.S. purchased the interests that Russia held in Alaska through the Treaty of Cessation in 1867. However, as David Voluck (1999, 95) notes, "[t]his supposed sale was a curiosity to the Tlingit Indians, since the Russians held little control beyond their stockade fences and lived on the land by permission of the Tlingit leaders. The U.S. government continued to make agreements with Indian tribes through statutes and executive orders, and clearly stated through several laws subsequent to the purchase that **the question of aboriginal hunting and fishing rights for Alaska Natives would be dealt with by Congress.**

Organic Act (1884)

The first law to point to these aboriginal rights was the Organic Act of 1884, which Congress passed in 1884 to create civil government in the Alaska territory. §8 of the Organic Act created a mining district,

and stated, “The Indians or other persons in said district shall not be disturbed in the possession of any lands actually in their use or now claimed by them, but the terms of which such persons may acquire title to such lands is reserved for future legislation by Congress.” However, the Organic Act’s creation of the first Western land laws in the region, and accompanying legislation in 1903, gave settlers “the ability to claim exclusively areas for canneries, mining claims, townsites, and homesteads, and to obtain legal title to such tracts. Since the Indians were not recognized as citizens, they did not have corresponding rights (to hold title to land, to vote, etc.) to protect their interests (Baker et al., 1995, 19).” The subsequent increase in economic development pressures saw the continuous breaking of the promise to leave Indians land claims undisturbed, as lands, waters, and hunting and fishing rights were all encroached upon by incoming loggers, miners, trappers, fishermen, and the government itself. This tension between expansion of white settlements and aboriginal land claims and rights was not resolved until the 1971 passage of ANCSA.

Creation of the Tongass National Forest (1902-1909)

When President Theodore Roosevelt issued a series of presidential proclamations that resulted in the creation of the Tongass National Forest in 1907, he withdrew some seventeen million acres from the traditional territories of the Tlingit and Haida people without their consent or compensation. As documented in A New Frontier: Managing the National Forests in Alaska, 1970-1995, the Forest Service failed to recognize traditional Indian use and aboriginal title for much of the 20th century. Much of the agency’s opposition derived from the uncertainty that land claims presented to the prosperity of the timber industry. Between the creation of the national forest in 1907 and the passage of the Alaska National Interest Lands Conservation Act in 1980, hunting, fishing and gathering rights were consistently eroded.

Alaska Native Allotment Act (1906)

During this period, Congress attempted to deal with their original promise to ‘not disturb the possession’ of lands that the Indigenous peoples were using or claiming by passing the Alaska Native Allotment Act of 1906. This act, which allowed any Alaska Native head of a household to apply for up to 160 acres of unowned mineral land, did solidify some parcels of Native owned land. However, it was ultimately unsuccessful in its goal of addressing the broad land claims by Alaska Native people for several reasons. There were a number of hindrances to applying for allotments, ranging from lack of understanding of legal requirements and outreach to fundamental differences between the concepts of Western individual property rights and traditional Indigenous laws of clan ownership. However, one of the biggest challenges to successful allotment applications was the following:

> “[Land was not considered eligible for a Native allotment if it was previously appropriated or owned. When Theodore Roosevelt withdrew seventeen million acres in the early 1900s to form the Tongass National Forest, federal law held that all of that land was owned by the United States. Thus, within the Tongass, any Native allotment applicant must have personally and exclusively used the land as an adult, before the formation of the Tongass National Forest” (Voluck, 1999, 100).

This prevented later generations of Alaska Natives that had become familiar with the language and the law from successfully filing applications because “mention of ancestors or ancestral rights” were not eligible in a Western interpretation of the law that only accounted for “individual personal use” of the land by the applicant (Voluck, 1999, 100).

Tlingit and Haida Land Claims (1929-1968)

The failure of the 1906 Native Allotment Act to address the widespread land claims of the Tlingit and Haida people resulted in the creation of the Alaska Native Brotherhood in 1912, which sought to protect Native hunting and fishing rights, fight for land claims, and gain citizenship to the United States and the rights that came with it. The Central Council of Tlingit and Haida Indian Tribes of Alaska (Tlingit & Haida) was created out of the Alaska Native Brotherhood in the 1930s specifically to fight for land claims in Southeast Alaska.

> "On October 7, 1959, the U.S. Court of Claims held that the Tlingit and Haida Indians had established their claims of aboriginal Indian title to the land in Southeast Alaska and were entitled to recover compensation for the uncompensated taking of their lands by the United States, and for the failure or refusal of the United States to protect the interest of the Indians in their lands or their hunting and fishing rights. The court held that the Tlingit and Haida Indians exclusively used and occupied a large area of Southeast Alaska at the time of purchase of Alaska in 1867, and that the land had not been abandoned by the Indians prior to the dates of taking (Baker et al., 1995, 25)."

Following this finding, a settlement was issued to Tlingit & Haida in 1968 that valued the land claims at $7.5 million. The court also assigned a monetary value to lost fishing rights (over $8.3 million), but declined to issue compensation for them.

The Court of Claims also found that the US government had consistently failed to protect Alaska Native rights, thus ensuring the following circumstances:

> "[It was] [P]ossible for white settlers, miners, traders and businessmen, to legally deprive the Tlingit and Haida Indians of their use of the fishing areas, their hunting and gathering grounds and their timber lands and that is precisely what was done. These Indians protested to the Government and their protests went unheeded… Whenever white settlers and businessmen entered their lands for exploitation, the Indians were forced to move out… [and] the amount of salmon and other fish taken from the streams and waters by the new white fishing industries and canneries left hardly enough fish to afford bare subsistence for the Tlingits and Haidas and nothing for trade or accumulation of wealth. Thus it seems clear that the United States both failed and refused to protect the interests of these Indians in their lands and other property in southeastern Alaska. (Voluck, 1999, 102 – citation from US Court of Claims."

Alaska Statehood Act (1959)

The finding that Southeast Alaskan Indians held aboriginal title to the land and were entitled to receive compensation for these rights was issued months after Alaska became the 49th state to enter the union on January 3, 1959. The Alaska Statehood Act granted the new state the authority to select over 100 million acres of "vacant, unappropriated and unreserved" lands in Alaska (Baker et al., 1995, 35). Alaska Natives across Alaska and in Southeast objected to the State's selection of lands, which encroached on their own aboriginal land claims. In Southeast Alaska, the land base to select from was also made smaller by the pre-existing 17-million-acre National Forest.

The Statehood Act left Alaska Native land claims, hunting and fishing rights in limbo by reserving the right of Congress to recognize and uphold aboriginal title for states that the land might select. The State constitution was drafted in the context by which Alaska's natural resources were being extracted en masse with the permission and support of the federal government, but without any of the federal revenues going back to support services and infrastructure for the local population. Thus, the writers of the Alaska

Constitution drafted natural resource management provisions that declared the settlement and development of the land and resources must benefit all people.

"To encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest… [and] to provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people (Constitution of the State of Alaska, art. VIII, §§ 8.1–8.2, 1959).

This provision would later come to prevent the State from fulfilling an obligation to protect Alaska Native subsistence hunting and fishing rights, which resulted in the creation of the subsistence dual management system in the 1990s.

Alaska Native Claims Settlement Act (ANCSA) (1971)

The most important laws for existing tribal rights in Southeast and across Alaska are the Alaska Native Claims Settlement Act (ANCSA) and the Alaska National Interest Lands Conservation Act (ANILCA), hence the previous references to this legislation. ANCSA was passed by Congress in 1971, conveying Alaska Natives title to 44 million acres of land and almost $1 billion in compensation. The monies and land were distributed through a novel framework of Alaska Native Corporations. In return, all aboriginal rights of hunting, fishing, and land claims were extinguished. However, the drafters of the law recognized the threat that this posed to the Alaska Native way of life. Congress intended that the Secretary of the Interior and the State of Alaska would work together to protect these practices, stating:

> "The Conference Committee, after careful consideration, believes that all Native interests in subsistence resource lands can and will be protected by the Secretary [of the Interior] through the exercise of his existing withdrawal authority… The Conference Committee expects both the Secretary and the State [of Alaska] to take any action necessary to protect the subsistence needs of the Natives. (U.S. Congress. House of Representatives, 1971)".

In Southeast Alaska, Alaska Native Corporations were given an economic mandate and became the largest private landowners of forested timberlands, during the height of the timber years. All ANCs in Southeast Alaska that received timberlands had harvest programs, which impacted adjacent Forest Service lands, access roads, current management regimes, and pressure for timber harvest. In the years after the passage of ANCSA, economic interests grew in competition with the traditional and customary uses of the land and a subsistence way of life. This competition for resources amidst growth and development occurred on state, federal, municipal, and Native corporation land and put increasing pressure on subsistence resources. The different mandates of the Tribes and the Corporations created significant tensions between these two entities that still impacts their relationships today, although ANC timber operations have precipitously declined from historic highs in the 1990s and 2000s. As the economic viability of logging decreased, most ANCs have now pursued carbon credit deals as new revenue streams. Sealaska's cessation of their timber operations in 2021, after signing a landmark carbon credit deal in 2019, significantly impacted the timber industry's economy of scale.

As noted by Baker et al. (1995, 40) in A New Frontier, **"There are inherent contradictions between the land requirements of the subsistence economy in Alaska Native villages and the capital, resource-development needs of profit-making Native corporations." The failure of the State and the Secretary of the Interior to protect the subsistence needs of Alaska Natives led to the creation of ANILCA and the subsistence management framework.**

Alaska National Interest Lands Conservation Act and Subsistence Rights (ANILCA) (1980)

Congress again attempted to protect the needs and cultural traditions of the Alaska Native community through the passage of the Alaska National Interest Lands Conservation Act (ANILCA) in 1980. ANILCA expanded protections for subsistence activities in Southeast Alaska, providing specific provisions to ensure continued access to traditional resources on federal lands. This law recognized the importance of hunting, fishing, and gathering for Alaska Natives and required federal agencies to prioritize subsistence uses in land management decisions. ANILCA's provisions were especially significant in the Tongass National Forest, where federal control over large swathes of land had previously restricted Indigenous access to traditional subsistence areas.

In Southeast Alaska, ANILCA created new protections for over five million acres of federal land, establishing a range of national parks, refuges, monuments, and conservation areas including Misty Fjords National Monument, West Chichagof-Yakobi Wilderness Area, Admiralty Island National Monument, the Stikine-Leconte Wilderness, Karta River Wilderness, expanding Glacier Bay National Park, and a variety of other landscapes that were significant for conservation and cultural use. Many of the areas that received protections appeared to be in an "untrammeled state," alluding to careful stewardship, given the long history of use and occupation of these lands. However, this 'untrammeled state' was also the result of a policy of the Forest Service to burn what they considered abandoned smokehouses and fish camps in these areas and others, as previously discussed. During the assessment process to date, Tribes emphasized the harm caused by the destruction of traditional infrastructure such as smokehouses and fish camps at traditional harvesting sites, and the additional harm caused by then being prevented from reconstructing any infrastructure due to protections like the Wilderness Act. Although ANILCA does contain specific provisions for building temporary harvesting infrastructure, the temporary timeframe applied is of temporary is insufficient, according to Tribes.

In addition to conserving a vast amount of wildlife habitat, ANILCA also recognized the importance of subsistence uses by Alaska Native people and rural residents more broadly. ANILCA Title VIII has the mission of safeguarding Alaska Native rights to continue traditional hunting, fishing, and gathering practices, integral to cultural identity and subsistence lifestyles. ANILCA Title VIII §801 declares the following:

6. "the continuation of the opportunity for subsistence uses by rural residents of Alaska, including both Natives and non-Natives, on the public lands and by Alaska Natives on Native lands is essential to Native physical, economic, traditional, and cultural existence and to non-Native physical, economic, traditional, and social existence".
7. the situation in Alaska is unique in that, in most cases, no practical alternative means are available to replace the food supplies and other items gathered from fish and wildlife which supply rural residents dependent on subsistence uses;
8. continuation of the opportunity for subsistence uses of resources on public and other lands in Alaska is threatened by the increasing population of Alaska, with resultant pressure on subsistence resources, by sudden decline in the populations of some wildlife species which are crucial subsistence resources, by increased accessibility of remote areas containing subsistence resources, and by taking of fish and wildlife in a manner inconsistent with recognized principles of fish and wildlife management
9. In order to fulfill the policies and purposes of the Alaska Native Claims Settlement Act and as a matter of equity, it is necessary for the Congress to invoke its constitutional authority over Native affairs and its constitutional authority under the property clause and the commerce clause to

protect and provide the opportunity for continued subsistence uses on the public lands by Native and non-Native rural residents; and

10. the national interest in the proper regulation, protection and conservation of fish and wildlife on the public lands in Alaska and the continuation of the opportunity for a subsistence way of life by residents of rural Alaska require that an administrative structure be established for the purpose of enabling rural residents who have personal knowledge of local conditions and requirements to have a meaningful role in the management of fish and wildlife and of subsistence uses on the public lands in Alaska."

ANILCA Title VIII §802 (1) requires that the utilization of public lands in Alaska "is to cause the least adverse impact possible on rural residents who depend upon subsistence uses of the resources of such land". It also requires that subsistence use is the priority over all other consumptive uses of fish and wildlife on federal lands in times when the take of fish and game must be restricted. In practice, Tribes often view these provisions as not being met. During the Alaska Roadless Rule process, Tribal cooperating agencies and the Southeast Subsistence Regional Advisory Council to the Federal Subsistence Board reminded the U.S. Forest Service they were responsible for an ANILCA Section 810 analysis, which had not been conducted for the Draft Environmental Impact Statement. The Section 810 analysis is necessary to determine whether a) a significant restriction of subsistence uses is necessary, b) the proposed activity will involve the minimum amount of public lands necessary, and c) reasonable steps will be taken to minimize adverse impacts on subsistence uses and resources. After a draft analysis is conducted, the U.S. Forest Service must hold Section 810(a)(2) hearings. In the case of the 2020 Alaska Roadless Rule repeal process, while the hearings were held, FSM 2090.23 states that they cannot precede the required subsistence finding, which they did. Therefore, the U.S. Forest was not following their own internal policy to meet the requirements of ANILCA.

While ANILCA protects the subsistence needs of Alaska Native people living near public lands in designated rural areas, it fails to comprehensively provide for the needs of urban dwelling Alaska Natives. Tribal citizens who reside in or move to urban areas are unable to participate in subsistence under ANILCA as they do not qualify as rural residents. However, this prohibition does not align with the customary and traditional use of resource values.

Another critique of the law centers on the definition of subsistence, provided in Title VIII § 803 of ANILCA:

> "Subsistence uses" means the customary and traditional uses by rural Alaska residents of wild renewable resources for direct personal or family consumption as food, shelter, fuel, clothing, tools, or transportation; for the making and selling of handicraft articles out of nonedible byproducts of fish and wildlife resources taken for personal or family consumption; for barter, or sharing for personal or family consumption; and for customary trade."

Subsistence is the legal term describing a survival state, but is used to refer to what Native people consider living a thriving cultural lifestyle. Subsistence is the policy and legal term used to describe an Alaska Native way of life, and is widely considered to be an inadequate and degrading term that fails to encompass the meaning of practicing and living one's culture on the land. *In Newton and Moss's Haa Atxaayi Haa Kusteeyix sitee, Our food is our Tlingit way of life* (2009, viii):

> "During our first meeting with the Elders, these knowledge bearers shared the pain they carry in their hearts toward the Forest Service, and towards those western ways that attempt to minimize the sacredness of our traditional ways. As Tlingit, Haida, and Tsimshian people, we are taught to have respect for our food; for the animals and plants that constitute our food; and for the teachings of our Elders with regard to the gathering, preparing, sharing and eating of our food.

> Our respect for our food is evidenced in the beautiful totem stakes that our Tlingit ancestors placed in streams to greet the salmon as they returned to their birth places; in our intricately carved feast dishes; in the stories we teach our young about the relationship between the Tlingit, the Haida, and the Tsimshian and the animals that are our sustainers of life; and in our songs and dance, as is evidenced when our beloved berries are brought in at a koo.éex' (a memorial party). **Each Elder at that first meeting and at successive meetings, passionately objected to having their understanding of Tlingit food reduced to a regulatory word like "subsistence."**

Every element of this statement, from the pain carried by elders, given the history of governmental practices, to the poignant ending sentence was captured in every Tribal meeting that the Tribal Engagement Team conducted as part of the assessment process in 2024. The original meetings referenced in the quote took place in the 1970s and 1980s. **This indicates that there have been decades, if not an entire century where the Forest Service has failed to truly understand their impact, and the impact of other agencies and governments on Tribes and Native communities.** This provides an imperative for the Forest Service to take the time to listen to this history from each Tribes perspective, understand the pain and historical trauma that exists, and use this starting point to build a lasting relationship with Tribes.

ANILCA provides the current dual management subsistence framework that seeks to protect Alaska Native hunting and fishing rights on federal lands. After the passing of ANILCA in 1980, the State of Alaska adopted regulations creating a "rural" subsistence priority in order to comply with ANILCA. In 1989, the Alaska Supreme Court ruled that the rural residency preference violated the Alaska Constitution in McDowell vs State, 1988. Therefore the management of hunting, fishing, and trapping on federal public lands and non-navigable waters became the responsibility of the federal government in 1990. The State of Alaska continues to manage hunting, fishing and trapping on non-federal lands and navigable waters for both Alaska residents and non-residents. While the dual management of resources is tied to land ownership, fish and wildlife populations often cross-over, often making it confusing for subsistence users and creating conflict between the management agencies.

Specifically, §810 of ANILCA outlines how the federal government considers subsistence when making land use decisions. The federal government is responsible for conducting an analysis and making a determination of whether or not the activity would restrict subsistence uses. The current Standards and Guidelines for subsistence analyses outlined in the 2016 Tongass Land Management Plan include and address three factors related to subsistence uses: 1) resource distribution and abundance; 2) access to resources; and 3) competition for the use of resources. This is often conducted by considering a single indicator species most susceptible to the land use change, which is usually Sitka black-tailed deer. This evaluation does little to compare other land use interests in light of subsistence.

In their interpretation of Title VIII of ANILCA, and how it applies in the analyses aimed at making land use decisions, the Southeast Subsistence Regional Advisory Council (2024) specifically stated:

> "ANILCA very clearly is aimed at protecting subsistence uses and ensuring the continuation of the rural subsistence way of life. In real-world situations, this Council has found that many things can effectively limit or constrain subsistence uses. These, of course, include resource scarcity when there simply is not a sufficient harvestable surplus to meet subsistence (and sport or commercial) needs. However,
>
> a. Competition from non-subsistence sport and commercial harvesters;
> b. Displacement from traditional subsistence use areas;
> c. Habitat degradation;
> d. Limitations on access to traditional subsistence use areas;
> e. Climate change affecting availability of subsistence resources;

f. Adverse weather conditions;
g. Lack of financial resources for the equipment and supplies needed to undertake subsistence;
h. Lack of financial resources to address information needs (monitoring, surveys, etc.);
i. Localized depletion in high subsistence use areas and other factors can interfere with meeting community subsistence uses and needs even when there is no overall conservation concern with a particular subsistence resource."

These factors play an important role in determining if subsistence uses are restricted and/or should be given a priority and should be integrated into updated Standards and Guidelines for ANILCA Title VIII analyses.

For rural Tribal citizens, ANILCA Title VIII and the Federal Subsistence Management Program is currently the only tool at their disposal for ensuring rights to subsistence resources on federal public lands. However, the implementation of the law has only proven to be litigious because of the complicated dual management system and how land use decisions are made internally within the federal land management agencies. By and large, Tribes in Southeast Alaska have rarely been fully informed of how Title VIII of ANILCA is applied by the federal agencies, making it difficult to weigh in on how a meaningful subsistence priority should be granted when it comes to making land use decisions.

Natural and Cultural Resources

In almost all of the Tribal engagement meetings, deer, salmon, and cedar trees were the top resources that were mentioned in regard to habitat, access, and management concerns. As such, these species have received an in-depth treatment in this chapter. However, this focus is not meant to detract from the importance of other natural resources that are stewarded and used for cultural practice. Other birds, animals, and fish of tribal importance are documented, along with botanical resources.

Deer

Sitka-black tailed deer are an important animal in Tlingit, Haida and Tsimshian cultures. Archaeological sites on Admiralty Island dating back 1600 years include butchered deer bones in their assemblages, showing a long history of indigenous use of the resource. Deer are incorporated into Tlingit culture through mythology, dance and ritual. An example is a complex ceremony for certain peace-making occasions between clans. In Tlingit the name of the peace maker is, Guwaakaan, the Tlingit word for deer.

Deer were likely an important species historically, because they were abundant throughout the islands of Southeast Alaska. Deer provide a significant food source, their hides are used for clothing, and other parts of the deer are used in ceremonial regalia. Examples include deer hides for drum, hooves for rattles, and antlers for tool handles. Cultural lessons related to deer hunting include the following: Never brag about hunting; deer are intelligent and when you harvest a deer it is because the deer is offering itself to you. Traditionally, all parts of the deer are used, and the first harvest of the season is shared with elders. Deer stomach, liver and heart are particularly prized by elders.

Sitka black-tailed deer use a variety of habitat throughout the year. During the summer, deer may be found dispersed in various habitats such as forests, muskegs, meadows and clear cuts. In August and early September, they may be found in the alpine, and then moving down with the snow line in the fall. In the winter they may be found along the beaches and in old growth forests. Their distribution is most limited in the winter and as such, the primary tool used when evaluating deer habitat is the collection of winter range deer habitat data. Deer needs center around abundance of available browse species such as

red huckleberry, bramble, and bunchberry, as well as topographical features such as aspect, elevation, and canopy cover.

Extensive wildlife planning has occurred on Prince of Wales Island in the past, in particular a Unit 2 Deer Strategy that the four federally recognized Tribes on the island were involved, along with other citizen groups and the Federal Subsistence Management Program. Restoring and rehabilitating the Tongass National Forest to its pre-logged state was identified as a long-term policy goal that was needed for the continuation of subsistence uses for deer. It was recognized that ecological damage had been done and that restriction to local harvest of deer resulted from reduced availability of deer, changed predator-prey-human relationships, and altered vegetation composition.

An emergent threat to deer populations is the loss of habitat on large tracts of land where clear-cut timber harvest has occurred. While initial forest regeneration stages (15-25 years after timber harvest) provide a multitude of browse vegetation for deer, the open canopy does not provide for snow interception during the winter, making it less useful habitat. As tree saplings grow, the forest canopy closes as habitat enters a long-lasting stem exclusion stage (>100 years). Stem exclusion is extremely poor deer habitat; the understory becomes difficult for deer to move through and the availability of browse vegetation diminishes making larger tracts of land unavailable as deer habitat. As the stem exclusion stage advances and conifers thin out and grow, the understory opens up some, however the lack of sunlight on the forest floor prevents browse species to grow. Tree thinning prescriptions can assist to open up the canopy to allow sunlight through, however in many cases this allows for additional conifer regeneration as forb species are no longer present to colonize.

On Prince of Wales Island, a variety of factors may be leading to the subsistence needs of deer not being met. Predation by wolves and bears, competition from other hunters (off island and non-residents), and stem exclusion in young second growth habitat conditions are all high pressure confounding factors that make managing deer populations a challenge. In other areas of the Tongass National Forest, in particular Unit 4, local knowledge has indicated that competition for deer may be impacting local residents from meeting their subsistence needs. While biologists have said that the deer population in Unit 4 as a whole is plentiful and stable, there may be localized depletions that are not well understood.

Hoonah Indian Association is just beginning a project through funding provided by Forest Service and in cooperation with Alaska Department of Fish and Game to assess local populations of deer around communities in Unit 4.

Other Animals and Birds

In addition to Sitka black-tailed deer, other animals that are culturally important to Tlingit, Haida, and Tsimshian people, that are reliant on the Tongass National Forest, include brown bears, black bears, mountain goats, seagulls, bald eagles, marten, ermine, and beavers. Moose migrated into the Southeast Alaska region in the early 1900s and became important to tribal communities as an additional food source. Old-growth forests are important habitat for many of these species.

Alexander Archipelago wolves (A.A. wolves) are an important cultural species for the Tribes, and features in creation stories. Wolf is sometimes used interchangeably with the Eagle moiety. Wolf management is an important concern for Tribes, especially in regards to how they impact deer populations. As mentioned above, local Indigenous observation of wolves conflicts with Forest Service and State population estimates on Prince of Wales. The State of Alaska has lowered harvest limits of the wolf, which negatively affected deer harvest. Inaccurate estimation of population led to conservation groups attempting to list the Alexander Archipelago wolf as an endangered species, which Tribes have disagreed with. Tribes have sought to elevate their historical knowledge of wolves and local Indigenous

observation of a healthy population to improve the management of wolves, which Dr. Stephen Langdon (2024) has conducted research on in collaboration with local culturebearers and harvesters. Findings from their research influenced the 2023 decision of the US Fish and Wildlife Service to not list the A.A. wolf as endangered. This was a groundbreaking decision where a federal agency reached out to Native people to incorporate their Indigenous knowledge into the study. The Forest Service can support other agency decisions like this through funding for research and Indigenous monitoring.

Mountain goats may be a species more culturally important for its other uses, in addition to food. Goat hair was and is spun with cedar bark, and used in Chilkat weaving, and spun goat hair is also used in Ravenstail weaving. The earlier Chilkat robes date back to the mid-18th century. Other uses include clothing, bedding, headdresses, and tools, and the sinew was used for string, snares and twine. While mountain goats use steep rugged mountain habitat and alpine areas, they are also reliant upon lower elevation old growth forests, just below the tree-line where snow is intercepted and browse vegetation is available during the winter.

While the above-mentioned culturally important wildlife species are typically considered when land use management and activities are evaluated, as most are currently considered management indicator species (MIS) in the Tongass National Forest, their historical and traditional values and contemporary importance are not a part of analyses. Managing for and maintaining healthy populations of these culturally important wildlife species to include their continual use by Alaska Native peoples needs to be considered when activities are evaluated.

Salmon

Salmon are a central part of the culture, identity and survival of Tlingit, Haida and Tsimshian people, and have been for thousands of years. The Tlingit and Haida considered themselves Salmon People or People of the Salmon respectively. Salmon became a central part of Indigenous culture because it was a primary food source that was readily available and abundant in Southeast Alaskan waters. Because they relied heavily on salmon for sustenance throughout the year, it allowed the Tlingit, Haida, and Tsimshian to connect culturally and establish traditions surrounding their harvest and preservation. Over time, their way of life became deeply intertwined with the salmon migration cycle.

> “The most valuable property of the Tlingit was the fishing ground or salmon stream, which was a family [lineage] possession, handed down through generations, and never encroached upon by others. In the case of a poor family that lacked a stream sufficient for their needs, or if they had suffered a failure of the run, another lineage might extend an invitation to fish in their stream, but only after the owner had satisfied his needs (Emmons, 1991).”

Langdon and Sanderson (2009) provides a detailed accounting of Haida ownership of stream systems on southern Prince of Wales in their traditional territory, and provides some information of how they were governed by the families that owned them. Traditionally, the family of the owner traveled first to their fishing streams, followed by those with kinship rights and then those authorized by the owners. This extended into the early years of commercial fishing, where fishermen fishing for specific canneries paid a lease to the stream owner, until the mid-1890s.

Indigenous traditional knowledge and spiritual beliefs led to stewardship practices that sustained salmon runs throughout human history. Professor Dolly Garza Skungwaii, spoke on these stewardship practices and beliefs at the Hidden Forest Values Conference in 2003 (7):

> "A respectful relationship with the land, critical to cultural survival, had developed over thousands of years. Each upcoming generation had to be taught when, where and how much to

harvest. Inclement weather, physical strength and endurance, seasonal migration, and varying seasonal needs all served to naturally limit harvest levels. In the forest it was work to fall one large cedar tree let alone enough to put up a large clan house. This required the work of the community. There were no exports of raw lumber because other communities had access to their own trees. Carved masks, dance staffs, or paddles were traded across villages – small market: high value – but low volume production. Berries, devils club, spruce root, tea, and Indian potato were picked in short seasonal spurts. In most cases, harvest time was limited by the ripeness of the berry or the need to harvest another resource with a short window of opportunity. To help children remember the importance of respecting resources, stories were told of respect and consequences for disrespect. A girl who disrespected bears ended up marrying them. A boy who disrespected moldy salmon was captured by the salmon and lived with them. He returned with the spawners, transformed back to human, and carried the message of respect for salmon to his community."

Indigenous people practiced stewardship through conservation. Salmon were treated with respect; cruelty, torturing, insulting or wanton killing of them was believed to bring misfortune, death and punishment in the afterlife. Traditionally, Indigenous people only took what they needed, were respectful to the salmon that gave its life, and were careful not to waste any part of the salmon.

Stressors and Challenges

Salmon face many stressors and challenges, including climate change, overfishing, and bycatch. There are a number of potential direct and indirect impacts to salmon from climate change. Warming ocean, lake and stream temperatures can directly affect salmon during different life stages. In southern Southeast Alaska, warming creek temperatures have been interfering with run timing of sockeye salmon, delaying their return into the freshwater at a time they are biologically ready to lay and fertilize eggs. This in turn may cause delays in reproduction and/or success in survival rates. Indirectly, changing ocean temperatures may be affecting prey species of some salmon, and in turn salmon are returning to spawning grounds smaller in size. The competition between natural salmon stocks and hatchery salmon stocks is also being studied as a potential reason for smaller size. In Southeast Alaska, large storm events may be linked to an increase of erosion effects, and landslides may be becoming more frequent. The sediment loading into the stream and river systems has the potential to bury salmon spawning beds. Coupled with inadequate stream buffered stream banks and the effects of erosion are greater.

Southeast Alaska forest habitat is critical for salmon survival. Ecological services that forests provide to anadromous streams includes stable banks that reduce sediment in the water, shade to keep waters cool and provide cover for fish, instream habitat from fallen trees, and organic matter that provides food for aquatic insects that fish may eat. Forests help with stream structure, temperature regulation and flood control. Large trees that fall into waterways provide some of the most important instream fish habitat as large woody debris. Tribes have consistently highlighted the importance of forest management with salmon production as a priority, and many Tribes are engaged in or have expressed desire to engage in co-stewardship of critical salmon streams.

Inability to meet subsistence needs is another issue that Tribes have weighed in on. Management of salmon populations in Southeast Alaska is complex, involving both state and federal government agencies as well as international treaties. In general, the State of Alaska regulates and manages the harvest of salmon in saltwater for subsistence, personal use, sport and commercial fishing. While the State of Alaska also regulates in-stream fishing of salmon for sport and personal use, the Forest Service regulates in-stream subsistence fishing. Under state agency management for fish, the current metric for determining whether or not subsistence needs are being met for households, are the “Amounts Necessary for

Subsistence" or ANS. The federal subsistence management program used ANS for a long time, before making the transition of increasingly using testimony to the Southeast Alaska Regional Advisory Council (SERAC) and traditional ecological knowledge as information beyond ANS regarding whether or not subsistence needs are being met.

Culturally, for Indigenous peoples, trying to empirically determine whether subsistence needs are being met by providing a harvest range is a conflicting way to manage resources to meet needs. Kwáans, or tribal families, worked together to assure all the needs within the community were being met. Providing for all community members was a way to ensure that no family was a burden during the winter when foods were scarce. One example is that those having the methods and means to fish and preserve salmon in Hydaburg, would make sure to put up and share up to 100 salmon (across species) per family within the community each year. This would assure that a family not able to harvest would not go hungry during the winter when food was scarce and would not be a burden on those who may have only fulfilled their immediate family needs.

Other fish

Other culturally important fish species that may be found in freshwater habitat affected by land management activities would be eulachon and steelhead trout. Eulachon, or hooligan, are an anadromous smelt that return to larger rivers to spawn. In Southeast Alaska, these include the Unuk, Stikine, Taku, Chilkat, Chilkoot, Alsek and Situk Rivers. They are also known to return to Berner's Bay, and there are other smaller systems with populations that very little is known about (i.e. Taiya River). Hooligan are rich with nutritious oil used as both a high caloric food, as well as medicine. They were considered by some as "salvation" fish, returning in early spring after long hard winters. Hooligan were an extremely important trade item, providing a socio-political structure around kwáans located near their spawning grounds. Steelhead trout return to freshwater to reproduce in the late fall through the early spring, making these species an important winter fresh food source for Indigenous cultures.

Halibut is a very important traditional harvest species that is being affected by the catch rates of sport fishing lodges, which are permitted in part by the Tongass National Forest outfitter/guide program. Greater understanding of the special use permits that the Forest Service allows, along with federal management of halibut need to be assessed in regard to whether they are prioritizing subsistence harvest as required by ANILCA.

Botanical Resources

There are numerous botanical species within the Tongass National Forest that are important in Tlingit, Haida and Tsimshian cultures. Often referred to and sometimes managed as non-timber forest products, they offer a wide variety of food nutritional, medicinal, and cultural significance to Alaska Native people. Berries are likely the most common plant used as food, and berry patches were owned by families and passed down for generations. Thornton (1999) outlines the interconnectedness between indigenous peoples and berries.

> "Indeed, aboriginal Tlingit ecology held that humans play an integral role in the maintenance and regeneration of plant and animal species through activities associated with the harvest. One basic tenet of this ecology is that berries are "there to be picked," and if they are not harvested, they may "die off" or fail to bear fruit for a period of time. Thus consumption helped to make the berry a "renewable" resource. This idea evidently stems from an even more basic ethno-metaphysical principle that is found among all Alaska Native groups, namely that berries, like all plants and animals and other elements of the cosmos, possess an agentic spirit or inner form, which must be

> treated with respect. If treated properly, the plant will be renewed, but if its spirit is ignored or offended, it may withdraw its support of life-sustaining resources".

Aside from the fruit as a nutritional food and medicinal resource, berry plants offered other valuable uses. Leaves were consumed and considered a spiritual medicine, and they were used to make teas. Salmonberry stem new growth, or "shoots" were also consumed.

There are also several plant species that are culturally important for medicinal uses in indigenous cultures. Devil's club can be said to be analogous to ginger, it is in the ginseng family, and it was considered a "cure all" species and had numerous applications. It was generally used for arthritis, colds/flu, constipation, cuts/scrapes, infections/inflammation, measles, menstrual problems, pneumonia, stomach trouble, tuberculosis, and venereal disease. While often administered as a tea, it was also chewed, made into an infusion/decoction, powder, and salve and used in a bath or steam. Devil's club was also an important spiritual plant, used to treat spiritual disease and stress, as administered by shaman. It was also an essential tool in an uncle's training of nephews or Aunts of nieces, whether as a discipline tool, or as part of a preparatory ritual for difficult tasks. Devil's club is commonly found in moist environments, particularly around stream corridors, and may provide shade for stream systems. The newly forming leaves are harvested as a food resource and may also provide browse for Sitka black-tailed deer.

Other important botanical resources of note include spruce tips, labrador tea, mushrooms, fiddlehead ferns, and hemlock branches. It should be noted that this list is not exhaustive and more information on the extensive use of the diverse botanical resources of the Tongass by the Tlingit, Haida and Tsimshian people is available from sources including the Kayaani Commission in Sitka, Alaska, individual Tribes, and Goldschmidt & Haas (1998).

Cultural Use of Wood and Cedar in Southeast Alaska

The Indigenous peoples of Southeast use a variety of wood and different parts of trees for cultural uses. From weaving hats, clothing, bowls, tools, and regalia with spruce roots and cedar bark, to making halibut hooks out of multiple types of wood with different densities so that the hook floats appropriately on the bottom of the ocean, to carving masks, dugout canoes, and totem poles, Tribes depend on the trees and wood products of the Tongass to support a wide range of cultural, economic, and artistic practices.

Spruce was used for hats, baskets, rope and fishing line. The tips were eaten for vitamin C, and the resin has medicinal properties like antiseptic. Hemlock is harvested and set in the water to gather herring eggs when the herring return to spawn in the spring. Yew is an important hardwood that was used in handles for spears and halibut hooks. However the focus of this section is on cedar, which can be seen as especially important for cultural uses. These ancient trees are deeply intertwined with the traditional way of life, sustaining both the material, medicinal, and spiritual needs of Alaska Native communities on the Tongass, and may also be the most endangered from historical commercial harvest and the threats of climate change.

For millennia, the Tlingit, Haida, and Tsimshian have respectfully harvested these resources from the land to house themselves, transport goods and people throughout the region and beyond, provide for the harvesting of animals and fish from the ocean, pass stories and lessons onto future generations, attribute shame or honor to specific clans or people, and mark important moments in history. Western red cedar trees are often referred to as the 'tree of life' by Indigenous people of the Pacific Northwest, where the Tongass National Forest comprises the northern end of the species' reach.

The Forest Service publication, *Haa Atxaayí Haa Kusteeyíx Sitee: Our Food is Our Tlingit Way of Life* (Newton & Moss, 2009, 30-31), confirms that harvesting large trees, "was critical to the Tlingit atxaayí

way of life." Traditionally, appropriate harvesting of large cultural use trees had as many laws and rules as the harvesting of food resources. In both cases, while the use of the western term, "resource," offers easy reference, it does not capture the essence of connection that the Native people had to these entities that they consider their relatives, who are equal beings in the landscape, who live in clan houses and have practices the same as them. When thinking in the terms of relatives, it becomes easy to understand that the greatest respect and preparation must be taken when you take from your relatives. Tlingit, Haida, and Tsimshian nations across the region had various practices to offer appropriate gratitude and balance when taking down a tree. A common cornerstone for all three nations was to thank the relative for offering themselves to you, to thank the remaining aas'Kwaani, tree people, for the taking of their relative and to let both know how important the utilization of the tree would be in detail, while also representing the great honor that the tree people have bestowed upon the user. Today, conserving remaining old-growth red and yellow cedar for culture and heritage is a particularly important issue for Tribes on the Tongass, as the future availability of these trees is threatened by a combination of factors, including logging practices and climate change.

Stewardship and the Significance of Cedar

On the Tongass National Forest, Western redcedar (Thuja plicata, or laaý, ts'úu, ggalaaw in the languages of Tlingit, Haida, and Tsimshian, respectively) is found predominantly on the southern end of the forest, with significant species density on Prince of Wales Island. The northernmost extent of the species is Kupreanof Island, the farthest north island that contains significant groves of Western redcedar, before the species composition tends to favor growth of yellow cedar trees. The limited range of red cedar and its prized applicability for totems and canoes made the species an extremely important trade item with northern and Inland Tribes. On the other hand, yellow cedar (Callitropsis nootkatensis, or xáay, sçahláan, and wahl, in the languages of Tlingit, Haida, Tsimshian, respectively) has more range and dominates the northern Tongass, stretching to Yakutat and Cordova. Among the healthy stands of yellow cedar, there is also a growing prevalence of dead or dying stands that has been associated with climate change (Hennon et al., 2006).

Cedar is revered by Alaska Native communities for its myriad uses, durability, and spiritual significance. The extreme versatility of cedar is described by Hilary Stewart in the opening pages of her book, Cedar (1984).

> "In a small clearing in the forest, a young woman is in labour. Two women companions urge her to pull hard on the cedar bark rope tied to a nearby tree. The baby, born onto newly made cedar bark mat, cries its arrival into the Northwest Coast world. Its cradle of firmly woven cedar root, with a mattress and covering of soft-shredded cedar bark, is ready. [...] The young woman's husband and his uncle are on the sea in a canoe carved from a single red cedar log and are using paddles made from lengths of knot-free yellow cedar. When they reach the fishing ground that belongs to their family, the men set out a net of cedar bark twine weighted along one edge by stones lashed to it with strong, flexible cedar withees. Cedar wood floats support the net's upper edge. Wearing a cedar bark hat, cap and skirt to protect her from the rain and the cold, the baby's grandmother digs into the pebbly sand of the beach at low tide to collect clams. She loads them into a basket of cedar withe and root, adjusts the broad cedar bark tumpline across her forehead and returns home on the beach. The embers in the center of the big cedar plank house leap into flame as the clam gatherer's niece adds more wood. Smoke billows past the cedar rack above, where small split fish are hung to cure. It curls its way past the great cedar beams and rises out through the opening between the long cedar roof planks. The young girl takes red-hot rocks from the fire with long tongs, dips them into a small cedar box of water to rinse off the ashes, then places the rocks into a cedar wood cooking box to boil water for the clams her aunt gathered.

> Outside the house stands a tall, carved cedar memorial pole, bearing the prestigious crests of her family lineage. It had been raised with long, strong cedar withe ropes and validated with great ceremony." (Stewart, 1984, 17).

Red cedar is desired for its straight grain and resistance to rot, which helps these canoes, poles, and other structures endure for centuries in the harsh maritime environment. Yellow cedar has many similar properties to red cedar, but differs in its durability and the trees are smaller than the red cedar. The characteristics that make a tree suitable for a totem or canoe make them rare on the landscape, especially given pressures from the commercial logging industry that have also sought out these giant trees. The 'monument trees' that are used for these purposes are usually 450-600 years in age, have long, clear trunks free from knots, branches, or other defects, and are characterized by their tight grain from slow growth.

The bark of red and yellow cedar, in addition to the roots of Sitka Spruce trees, is used for weaving items like baskets, bowls, regalia, hats, sleeping mats, clothing; and in more modern times, earrings and other gifts. When bark is collected properly, it is stripped from the tree in a way that ensures the tree can continue to survive and grow. Bark harvests usually consist of one strip no more than 30% of the diameter of the tree at the strip initiation. The bark must be processed and dried for a year or more before it can be used for weaving. Tree location, diameter, age, quality of external bark, the time of year, how the sun impacts the tree, and branch location are just some of the factors considered when selecting a tree for bark harvest (Riley & Anderson, 2021).

Tribes have urged the Forest Service to incorporate Alaska Native values and stewardship practices into cedar management. One of the most common stewardship practices is using limited, selective tree harvest, and practicing gratitude or honoring of the tree before or during harvest to properly respect the tree's sacrifice (Johnson et al., 2021, 14). The Tlingit, Haida, and Tsimshian's long-term stewardship of cedar forests has been guided by principles rooted in Traditional Ecological Knowledge (TEK), which emphasizes the interdependence of all living things. TEK embodies a deep respect for the land and natural resources, encouraging the sustainable use of the forest and its gifts. For the Tlingit, Haida, and Tsimshian, this knowledge has been passed down through oral traditions, ceremonies, and hands-on learning. Elders in the community continue to teach younger generations how and when to harvest cedar bark without killing the tree, how to respect the interdependence of the tree on its surrounding environs, and how to give back to the land through rituals of gratitude. Tribes on the Tongass view cedar trees as sacred entities, not merely resources but living beings that play a central role in Indigenous cosmology.

Current Stressors and Challenges

The contemporary landscape presents numerous challenges to the traditional use and management of cedar forests. Industrial logging and the high demand for rot-resistant products has dramatically altered the availability of old-growth cedar, particularly in the Tongass National Forest, where many of the remaining old-growth trees are found. Younger trees often lack the size, tight grain, and other characteristics that make them suitable for totem poles and canoes. Additionally, cedar forests are increasingly at risk due to climate change, which has led to the decline of yellow cedar in particular. Warmer temperatures and shifting precipitation patterns are causing yellow cedar trees to die off, as their thin, shallow root systems are more vulnerable to freeze-thaw cycles due to variability in snow cover. Tribes have expressed the priority of continuing monitoring and research of the effect of climate change on these critical species, with focus on working with the users, artists, weavers to assure communication and sharing of observations and knowledge.

Tribes are particularly concerned with protecting "monument trees," large, culturally significant cedars that serve as the foundation for Tlingit, Haida, and Tsimshian art and cultural practices. Despite their

ecological and cultural importance, these trees are often targeted as valuable products by logging operations, driven by the high demand for cedar wood in international markets. In addition to logging pressures, other factors that Tribes have identified as inhibiting access to cultural use trees is the time-consuming bureaucratic process, and the prohibitive cost of helicopter logging if suitable trees cannot be located on the existing road system.

It is important to note that the timber industry targeted high-value cedar stands throughout its history. An impactful statement from our Tribal engagement came from Tsimshian carver, leader, and culture bearer David R. Boxley (personal communications, 2024):

> "If you take every totem carved over the last 60 years, they would barely fill up the bottom of a single log ship. Now imagine 60 years of thousands of log ships leaving Southeast Alaska and how many potential totem logs have been lost forever."

Recognizing the existential threat posed by climate change, Tlingit, Haida, and Tsimshian Tribes have also focused on developing climate adaptation strategies to ensure the survival of their forests and cultural practices. Tribal climate adaptation plans emphasize community-driven efforts to monitor forest health, restore degraded ecosystems, and work collaboratively with federal and state agencies to mitigate the impacts of climate change. Tribes and their partners have also established greenhouses and begun planting red cedar outside of their current native range, to account for the impacts of a warming planet over a 400-year growing period.

The die-off of yellow cedar is an often-cited concern in Tribal climate adaptation plans. Southeast Alaska will experience increased precipitation, but snow cover will decrease as temperatures rise. The snow cover usually shields fragile cedar roots from freezing temperatures, but increasingly erratic freeze-thaw cycles and lack of snow cover have exposed increasing amounts of yellow cedar to mass die-off events. The Tlingit & Haida Climate Adaptation Plan (2019, 25) identifies Cedar as a "very high priority area of concern," which are areas that share high community value, particularly high cultural importance, and limited potential for adaptation.

Another challenge is cedar's limited range, which results in an entire region of carvers being dependent upon trees that only grow in a few Tribes' traditional territory. Concern has been expressed about the need for clans outside of the cedar growing areas (predominantly the Northern Tongass) to gain permission to utilize trees from the clans within the territories from which they grown (primarily the Southern Tongass).

For years, Sealaska provided cultural use logs harvested from their lands; the communities closest to this timber on Prince of Wales Island were impacted the most. Sealaska shut down their timber operations in January 2021 and can no longer fully subsidize the provision of logs without their broader logging operation. Sealaska has stated that it is the agency's responsibility to provide these cultural resources to carvers, especially considering that the Forest Service manages over 16 million more acres that they do.

Economic Impact

One of the issues identified by Tribes is that the Forest Service does not consider the economic and cultural impact that carving and raising a totem pole or dugout canoe can have on a community. Local demand for cultural use trees, as well as quantification of local and regional economic impact of the Alaska Native arts economy, is undervalued and needs further research. Carving and raising a totem pole can have a significant economic impact on a rural community through employment of master carvers and apprentices, renting a carving studio, buying the log, paying for elders guidance and stories, as well as transporting and erecting the pole. Sealaska Heritage Institute has sought to document the economic impact of commissioning a totem pole through their Kootéeyaa Deiyí project. An SHI memo from 2023

calculates, “The total economic estimated costs associated with the commissioning of a single 25-foot pole for the project was $218,500 in direct spending with an additional $65,000 on indirect and induced spending.” These costs do not fully account for the increase in travel and associated expenditures that accompany a totem pole raising, as clan members and their opposites from across the region will often travel to conduct ceremony and celebration with a pole raising. They also do not account for the continued benefit of cultural tourism, a growing sector of tourism where travelers look for historic and cultural experiences such as those found in rural communities that host totem parks.

Existing Direction and Advocacy from Tribes

Currently, cedar stewardship for access and long-term management is a top shared priority of most Tribes on the Tongass. There is a long history of cedar stewardship on the Tongass, from time immemorial to present day where Tribes, Alaska Native Corporations, and carvers have urged the Forest Service to set aside and protect areas with high densities of trees that are suitable for cultural use. Over the past fifty years, Sealaska has been the primary provider of totem logs to Tribes and Alaska Native artisans, sourced from their land base. However, Sealaska’s ability to meet tribal needs has diminished due to the impacts of commercial logging on the landscape, which also led to the cessation of the company’s timber operations. Given that the Forest Service manages far more land than Sealaska owns, the corporation has consistently advocated for the agency to become a more active partner in meeting cultural use tree demands from Tribes and artisans.

One such example of stewardship comes from the carvers of Kake in 1974. In the 2016 Amendment to the Tongass Land Management Plan, there is a special interest area called North Hamilton River Redcedar, an 80 acre timber stand set aside for cultural and botanical uses. The stand was identified as significant for cultural uses by the native carvers from Kake in 1974, who requested that the nearby Hamilton River Timber Sale be modified to protect these trees for future use. This redcedar is the only easily accessible grove near Kake.

In 2012, the Hydaburg Cooperative Association worked with the local ranger district to set aside a cultural use preserve on Sukkwan Island, although a final memorandum of understanding was not signed. A cultural resources inventory was conducted, proposing a 24 acre preserve on Sukkwan Island, where the Tribe could “remove trees as necessary for their usage in the construction of totem poles or canoes without going [and] applying each time to the Forest Service for a review and permit.” In 2012, tribal carvers picked out 11 trees that they were interested in harvesting. At the time, a Ranger district recommended use of a specific categorical exclusion that permits the harvest of up to 70 acres of live trees for a special use.

In 2020, four Tribes sent a letter (Redcedar Letter) to the Secretary of Agriculture to signify their desire to proactively engage with the Forest Service to procure cultural use trees for carving, conduct an economic assessment for our local demand and cultural and economic use of red cedar trees, and co-create a long-term management plan that includes an inventory of remaining cultural use wood and protects these resources for current and future use. In it, the Organized Village of Kake, Organized Village of Kasaan, the Hydaburg Cooperative Association, and the Klawock Cooperative Association state the following about the agency’s failure to acknowledge the importance of the resource and local demand from Tribes and artisans:

> “We have seen studies that have calculated the demand that foreign nations might have for our timber and wood, but to our knowledge the local demand from the Alaska Native carvers, weavers, and artists that live here on the Tongass has never been assessed or reported by the Forest Service. In fact, much of the time, we have felt that our art, our culture, and our long tradition of local ecological knowledge, and our use of these wood products has been ignored,

> disrespected, underappreciated, and not factored into agency management activities, forest management, and timber demand studies. We do not know where this disregard comes from, whether it is disrespect, racism, continued colonialism, or just because Forest Service staff and economists are not sufficiently knowledgeable, educated, trained, and informed on our cultural use of wood and Northwest Coast Alaska carving and art traditions."

In 2021, Dr. Adelaide Johnson worked with Native carvers, artisans, youth, and communities to document and study the importance of wood products for cultural use and share management concerns and suggestions. A management suggestion offered by "Wood Products for Cultural Use: Sustaining Native Resilience and Vital Lifeways in Southeast Alaska, USA" correlates with the demand for an analysis of the 'market demand' by Alaska Native artisans and Tribes submitted in the 2020 Redcedar Letter. The use of a 'culture target' (Johnson et al, 2021,19) could describe how many logs a specific community needs, and would include economic demand calculations from Native carvers and Tribes that are seeking to carve or revitalize totems. Almost every Tribe that interacted with this assessment process named access to cultural use wood as a priority; often the top priority of any change in forest management regimes. The 'Wood Products for Cultural Uses' article reflects many of the same policy demands of the tribes, including: 1) modifying current timber sale procedure to include logs set aside for carvers and notifying weavers of the opportunity to strip bark, 2) identification and mapping of locations that contain trees appropriate for cultural use, 3) creation of preserves to protect high-density cedar locations, 4) ceasing silvicultural treatments in some young growth areas to promote natural cedar regeneration and slow growth; 5) plant cedar seedlings with a climate lens towards range migration, and 6) provide opportunities to engage youth with planting, monitoring, and other cedar stewardship practices.

One of the most significant efforts to educate and train the Forest Service about the cultural heritage of the Tlingit, Haida, and Tsimshian people through their use of cedar was a 2021 workshop that was co-hosted by the tribal governments of Hydaburg and Kasaan titled 'Cultural Uses of Forest Resources.' During this workshop, staff from the tribal governments shared with Forest Service timber cruisers and silviculturists about the cultural importance of cedar trees. Agency staff learned how to identify suitable trees for carving and weaving, and participated in bark harvesting and weaving activities while engaging in dialogue with Alaska Native artisans and tribal leaders. Throughout the workshop, tribes emphasized that the timber export business model that the Forest Service utilized, has hindered their long-term ability to support the expanding economic, cultural and spiritual needs of their communities. One of the goals that Tribes held in hosting this workshop was that increased knowledge of how to identify monument trees and document their location on the Tongass landscape would help meet current cultural tree and plant needs of the Tlingit, Haida and Tsimshian people as well as conserving the resource for future generations. As an outcome of the workshop, the Forest Service now identifies and maps suitable trees when conducting inventories for timber harvest units.

Alaska Youth Stewards crews across the Forest have also engaged in monitoring and inventorying cultural use trees, as well as planting stecklings. Tribes have advocated for continued engagement and support of these youth crews to advance their careers in natural resource management and increase use of the agency's ANILCA hire preference as well as expanding it to higher GS levels. Promoting youth crews and tribal crews working on the Tongass that are led by Indigenous knowledge and values is a great avenue to promoting the use of Tribal ecological knowledge, or Indigenous wisdom within the stewardship of the Tongass.

Trends and Drivers

Growing trend to address more fully Alaska Native traditional use and concerns on USFS-administered lands.

The Forest Service holds in public trust a great diversity of landscapes, areas, and sites that are important for the spiritual, cultural, and economic needs of Tribal communities on the Tongass. There are a variety of trends and drivers that are impacting access, ecosystem health and integrity, ability to practice subsistence hunting and fishing rights, workforce development, co-management, and protection of sacred sites. Below is a summary of feedback on the following trends and drivers received during tribal outreach.

Co-Stewardship/Co-Management Priorities

The importance of including co-stewardship in principle and practice across all areas of this plan revision cannot be understated. All Tribes that were consulted during tribal engagement expressed a desire for co-management and co-stewardship that centered on early consultation and engagement, as well as a decision-making role in the projects proposed around their communities. Tribes do not want consultation to solely be a box checking exercise that is only on an advisory basis; they want their contributions to carry weight and drive decision-making.

There is a need to define co-management, co-stewardship, co-governance in collaboration with Tribes, as definitions and understandings vary between participants. Co-management is generally described by Tribes as an equal seat at the table with equal decision-making power. The U.S. Forest Service does not currently have a definition for co-stewardship or co-management, and there is only a single reference to co-management in the entire U.S. code; the Marine Mammals Protection Act 16 U.S.C 1388 Sec. 119 (a) states “The Secretary may enter into cooperative agreements with Alaska Native organizations to conserve marine mammals and provide co-management of subsistence use by Alaska Natives (Nie & Mills, 2022). While explicit authority to do co-management is not prevalent in the code, the agency has a plurality of authorities that they can use to achieve the closest possible outcomes to co-management.

The 2020 Traditional Homelands Conservation Rule illustrates a vision of how the Forest Service might work cooperatively with Tribes to carry out its mission on the Tongass, stating:

> “We request that the USFS work cooperatively with our Tribal governments to protect, enhance, and restore the physical and biological resources of the Tongass, as well as social, economic, and cultural values on the areas identified through the collaborative process detailed above. This management direction should incorporate forest-wide conservation measures with the intention of protecting the unique subsistence and cultural values of the forest, its fish and wildlife, and the communities that depend on it. Conservation measures for the areas identified as needing protections under the Traditional Homelands Conservation Rule must be co-created with community input, and the Forest Service should enter into contractual agreements and utilize the authorities detailed below with the appropriate local tribal government to manage, restore, and protect the resources in these areas.”

Right now, there are several frameworks within Southeast Alaska that model how co-stewardship or co-management could look, without having legislation or authorities in place that specifically support it. Networks and collaborative efforts like the Southeast Indigenous Guardians Network, the community forest partnerships, the Alaska Youth Stewards program, the Yakutat River Rangers program, Tribal Conservation Districts, and Hydaburg subsistence fisheries monitoring program are all important examples to learn from and uplift as models for other Tribes as they seek to work with the agency to develop capacity and skills for monitoring, research, and management.

The Forest Service has also entered into agreements with Tribes to do co-stewardship with Tribes. Tlingit & Haida currently holds a co-stewardship MOU with the Forest Service that supports an Indigenous interpretation program at the Mendenhall Glacier Center. Sitka Tribe of Alaska has repeatedly expressed desire to pursue a co-stewardship agreement for the Redoubt area in Sitka, and specifically the falls and

lake that are used for subsistence harvest. They have also developed an MOU with Sealaska and Sealaska Heritage Institute, as Redoubt is a 14(h)1 site. Hydaburg has previously pursued a co-stewardship agreement for a red cedar preserve on Sukkwan Island for traditional cultural use, but an agreement was never signed. Hoonah Indian Association, along with a few other Tribes, has a variety of memorandums of understanding and agreements with the Forest Service, as well as supplemental agreements that provide funding for specific projects. Tribes have stated that the reporting burden associated with multiple supplemental agreements is cumbersome and detracts from the capacity to do the work on the ground. Future co-stewardship agreements should seek to alleviate or combine reporting requirements for different funding streams where possible.

One critical point to understand is that efforts to achieve co-stewardship require integration throughout the entire agency and all programs. Co-stewardship and co-management are not solely the purview of the Tribal Relations department; this framework must be incorporated throughout recreation departments, timber programs, ecosystem and watershed health programs, subsistence management, and so forth. It must be an effort and a direction that is undertaken holistically and is not the responsibility of any one person to steward, but rather a directive for everyone to incorporate into their work.

Climate Change

Climate change is the top issue for many Tribes. Concerns were expressed about how climate change will impact the health of subsistence resources (especially fish, deer, and cedar) and the habitat that they depend on. Many Tribes have created climate adaptation plans, including the Sitka Tribe of Alaska, Central Council of Tlingit & Haida Indian Tribes of Alaska, Metlakatla Indian Community, and Hoonah Indian Association. Hoonah Indian Association is discussing proactive climate adaptation strategies to create better anadromous stream habitat for fish as part of current restoration efforts, such as building deeper pools with more oxygen flow to account for future conditions.

The impacts of climate-driven extreme weather events are severely impacting Tribal communities. Deadly landslides have occurred in Sitka, Haines, Wrangell, and Ketchikan and are becoming more frequent due to the increased presence of atmospheric rivers and extreme weather events. The Sitka Sound Science Center (n.d.) developed the Kuti Project in collaboration with Tribal entities in six communities (Klukwan, Hoonah, Skagway, Kasaan, Yakutat, Sitka, and Tlingit & Haida) to create natural hazard monitoring and warning systems across the region.

Although the Tongass is a temperate rainforest, drought is also impacting communities, by leading to decreased salmon and trout survival rates, hydropower availability and energy costs, and increases in fires. Communities that are most impacted are in the Southern Southeast.

Other climate-driven impacts of concern to tribes include: impacts to marine and freshwater survival of salmon, halibut, hooligan, herring, shellfish; yellow cedar die-off; new pests and disrupted efficacy of existing natural pest control systems such as the Hemlock sawfly; impacts to berry timing and availability; and associated impacts from the loss of traditional foods and cultural resources to human and ecosystem health.

Primary land management practices and environmental changes with potential to affect traditional practices on the Tongass National Forest

Many Tribes are concerned with how land management practices and environmental changes in their traditional territories are affecting the ability of tribal citizens to practice their traditions and cultures on the Tongass. The conditions and trends of resources and landscape that affect areas of tribal importance on the Tongass are social, cultural, economic, and ecological. The 1976 Federal Land Policy and

Management Act (FLPMA) requires that the agency must balance multiple uses, and the Forest Service permits a wide variety of activities on National Forest System lands that may conflict with traditional cultural practices and uses by tribal people. However, the agency also has the obligation under ANILCA Title VIII §802 (1) to protect habitat and access to fish and wildlife populations for subsistence purposes, and the utilization of public lands in Alaska "is to cause the least adverse impact possible on rural residents who depend upon subsistence uses of the resources of such lands."

Land Acquisition/Land Disposal

Congress is considering multiple bills that would alter land ownership patterns on the Tongass, as well as the agency's ability to consider land exchanges and other mechanisms that could potentially impact traditional cultural practices. One bill addresses the Unrecognized Southeast Alaska Communities (or 'Landless Communities'), and seeks to amend the Alaska Native Claims Settlement Act through the creation of five new Urban Alaska Native Corporations in Southeast Alaska and the associated land acquisition of these new corporations.

Some Tribes are concerned about how land being withdrawn from the Tongass National Forest and taken into private ownership will impact the ability of their tribal citizens to access traditional harvesting areas and practice subsistence (which ANILCA allows on federal lands). There is also concern that the uses that would be permitted on these withdrawn lands, such as tourism operations, would conflict with how Tribal members currently use these lands. Hoonah Indian Association is concerned about the proposed land withdrawal at Neka Bay for the proposed Tenakee Landless corporation efforts. Neka Bay contains some of the last stands of productive old growth near Hoonah, which provides critical habitat for deer and contributes to local food security. The areas selected by the Landless corporations on Couverden Peninsula and Homeshore also encompass traditional hunting and fishing homelands of the Huna Tlingit. Craig Tribal Association has also requested LUD II protections for San Fernando Island be included in any iteration of the Unrecognized Southeast Alaska Communities bill that seeks to address the Landless Communities that did not receive urban corporations under ANCSA. The island is critical for food security and cultural harvesting practices and fulfilling subsistence obligations. Tribes in Haines, Petersburg, Wrangell, and Ketchikan have expressed support for the efforts to establish village corporations and select eligible lands.

Tensions arise where the new corporations are constrained to select land outside of their traditional territories, due to pre-existing designations or ownership, such as State land or national park designations. In order to address the conflict of selecting in another Tribe's traditional territory, Tribes have expressed that they want to see consultation and management discussions with any new ANCs created in order to discuss how they can protect the subsistence and cultural uses of their tribal members, and also to push the federal agencies to open greater land selection within the traditional territory of Landless Communities. State lands and other private ownership further decreases the amount of traditional territory available for selection. The main concerns were heard regarding access to and uses of land that have the potential to impact important subsistence habitat, especially old growth forests.

Another bill regards Vietnam Veteran Native Allotments, which orders the Secretary of Agriculture to identify lands available in the national forest system for allotments. Many Tribes have dedicated efforts to help Vietnam veterans and their heirs apply for these allotments, utilizing legislation passed in 1998 and 2019 to identify and withdraw parcels from federally-managed lands. On the Tongass, the proposed land base to select from is limited due to existing land designations such as wilderness areas, national parks, and ANCSA land transfers, along with broad preclusions of selection within the Tongass National Forest within the law. Tlingit & Haida, along with Sealaska and many tribes have been staunch advocates for the

ability of their tribal citizens to apply for allotments on their traditional homelands, instead of selecting in other eligible lands in the state.

Limiting/Increasing Access to National Forest Service Lands

Restricting access to public lands can have beneficial and adverse effects on Tribes and tribal citizens ability to partake in traditional cultural activities. Restricting access may be beneficial for when it preserves the solitude, quiet, and traditional character of lands necessary for practicing ceremonies and prayer. Restricting access to the broader public for a limited period of time was also voiced as a desire by multiple tribes to help Tribal citizens fulfill their subsistence needs and practice their cultural ways of life before commercial access or non-federally qualified users were able to access traditional hunting and fishing grounds. Restricting access, for example through the removal of roads, may have an adverse effect when it restricts Tribal citizens and traditional practitioners from harvesting opportunities along with beneficial restorative efforts.

Mineral Development

Many tribes, especially Tlingit & Haida, Wrangell, Yakutat, Ketchikan, Klukwan, Douglas Indian Association, Saxman, Kake, Craig, Metlakatla, Klawock, Petersburg, Kasaan, and Sitka Tribe of Alaska have expressed concern about mineral development on their traditional territories and how it may impact subsistence resources that depend on a healthy ecosystem. Several Tribes voiced concerns about mining companies delaying notification to the Forest Service about contamination events, and the agency failing to proactively contacting the tribe when there are leaks or potential contamination. A recent example of this is reflected in a 105,000 gallon tailings spill at Kensington Gold Mine near Juneau, AK (Canny, 2024).

Tribes have expressed that they want to have co-management authority in approving projects, or standards/guidelines that projects are held to, mitigation measures taken ahead of project implementation, and other decisions. Many Tribes are especially concerned with transboundary rivers and mining across the border in Canada that have potential for the downstream impacts on salmon and their habitat. The Southeast Indigenous Transboundary Commission elevates the concerns of Indigenous nations on both sides of the borders about these projects and calls for coordination from the State Department. On the United States side of the border, these rivers run through lands of the Tongass National Forest. Tribes have advocated for increased protections of these watersheds.

Some Alaska Native Corporations have interests in mineral development proposed on the Tongass National Forest, such as Goldbelt Corporation's interest in Herbert Glacier deposits. These, along with all proposed development within Tribal territories will require improved processes that allow for economic opportunity, environmental protections and stewardship that Tribes are requesting.

Vegetation Management

Many tribes were strongly opposed to continued clearcut old growth logging in their traditional territories; this remains a main concern regarding Tongass National Forest lands. Many concerns also focused on the harvesting of old growth cedar that is suitable for cultural use, with Tribes expressing desire for a long term access and management plan to provide cultural use wood to Tribes and artisans. Many of the most productive Forest Service-managed lands were clearcut between 1950 and 1990, which damaged subsistence harvesting habitat in close proximity to communities. Multiple tribes including Kake, Klukwan and Craig submitted resolutions requesting that the Tongass be included in the National Old Growth Amendment rulemaking process in 2024.

Tribes hold a variety of different opinions about young growth timber management and harvest. Many Alaska Native Corporations have transitioned from timber operations to carbon credit deals to generate income from their land bases. Tribes in Hoonah and Kake and Alaska Native Corporations in Craig and Angoon house local workforce crews that have participated in forest inventory training, and Hoonah is exploring purchasing the local mill to process young growth for housing. One perspective voiced by Alaska Native Corporations is that the Forest Service should not include the village corporation land in the agency's 'seek to meet' obligation under the Tongass Timber Reform Act. It is a priority for Alaska Native Corporations that the agency invest in coordinated workforce development with these entities for all available jobs within land management and second growth harvest. ANCs have also expressed desire for coordinated planning, such as has occurred within the All Landowners group, which has discussed planning use of infrastructure and roads to support both forest risks and second growth management. One of the most important concerns for second growth management, in the perspective of Tribes and corporations, is the priority to create, maintain, and enhance deer habitat. Some Tribes, such as Hydaburg, are wary of previous logging actions around their community and are opposed to a second growth logging industry. In general, Tribes have expressed concern over clearcut and round-log export models of harvest, and have been more supportive of efforts to develop a second growth industry that meets the needs of Tribal communities for building supplies, biomass uses, along with other Tribally accepted management practices that create local workforce development and employment opportunities that promote heterogeneous habitat benefits for deer populations and greater traditional uses.

Multiple Tribes, including Hoonah and Hydaburg, have expressed a desire for access to dead and dying trees near their communities for use as firewood, and to support Tribal firewood distribution programs. Tribes desires for a long-term cultural use management plan and a funded cultural use log harvest program are detailed above in Section VIII. Natural and Cultural Resources.

Fire Management

For most Tribes, fire management was not named as a top priority, given that the Tongass is located in a temperate rainforest climate. However, some Tribes are making preparations given the climatic changes facing the region. Tlingit & Haida has created a wildlands firefighting department that currently contracts out to fight fires across the State. There is possibility for growth in this department with erratic precipitation levels and events across the Tongass; more wildfires are expected in the southern region, where drought conditions are more prevalent.

Other comments received regarding fire management encouraged the agency to work across various land ownerships to coordinate resources to fight fires when they do appear.

Noxious Weed Control

Tribes have expressed medium to high levels of concern around the spread of invasive species and their ability to crowd out native plants. Preventing the spread of invasives is important to many Tribes; Skagway, Tlingit & Haida, STA and Kake (?) all have mitigation plans to address the spread of invasive species. Japanese knotweed is one of the more damaging invasives (Central Council of Tlingit and Haida Indian Tribes of Alaska, 2019, 19).

Special Use Permits

Tribes expressed a desire for the Forest Service to establish a preference or set-aside for Alaska Native applicants when issuing special use permits. Such measures would enhance opportunities for Tribal businesses and ensure equitable access to forest resources. Additionally, Tribes emphasized the need for

research to track the number of Native-owned operations on the Tongass, highlighting concerns about their representation and participation in the region's economic activities. Angoon and Kootznoowoo, Inc. specifically requested a Tribal priority in managing bear-viewing areas on Admiralty Island, as per ANILCA §506(3)(E) specifies that the Secretary of Agriculture "shall consult and cooperate with Kootznoowoo, Incorporated in management of Mitchell, Kanalku, and Favorite Bays, and their immediate environs, and the Secretary is authorized to enter into such cooperative arrangements as may further the purposes of this act [...] not limited to: permits for any structures and facilities, and the allocation of revenues therefrom; regulation of public uses; and management of the recreational and natural values of the area."

Conflicts between tourism activities, such as guided hunts, and the ability of local residents to meet subsistence needs were also noted as a growing concern. citing the cultural and subsistence importance of the island's resources. As mentioned previously, lodges and operators that receive special use permits to operate on the Tongass can impact subsistence resources that are outside of the jurisdiction of the Forest Service, like halibut management.

Expanding Recreational Use

Many Tribes have emphasized the need for increased investment in recreation infrastructure near their communities, highlighting its dual importance for cultural stewardship and economic opportunities in the tourism and outdoor recreation industries. The Alaska Youth Stewards (AYS) has proposed a recreation project for the old Soderburg Logging Camp near Kake. Ketchikan Indian Community is collaborating with the Forest Service to reconstruct the Naha Trail and recreation facilities near Ketchikan; the trail is used to reach a piece of Orton Rach property that the Tribe owns and plans to use for culture camp. The Petersburg Indian Association also seeks collaboration with the local ranger district to improve recreational facilities, demonstrating the value of partnerships that enhance both community access and visitor experience.

Tribal feedback underscores a notable disparity in recreation infrastructure. Smaller, rural Native communities often have fewer facilities and less accessible infrastructure than other communities in the region. This pattern shifts when considering areas that have been heavily impacted by resource extraction, where smaller communities bear a disproportionate share of the consequences.

Additionally, many Tribes have expressed a desire to see Indigenous languages incorporated into signage on recreation infrastructure. This inclusion would reinforce cultural heritage and provide a visible acknowledgment of Alaska Native connections to the land.

Impacts of Cruise Tourism

Increasingly, some Tribes and many Alaska Native Corporations (ANCs) have made significant investments in businesses that rely on cruise tourism, underscoring the importance of the Tongass National Forest as a scenic and recreational draw. ANCs with large-scale cruise tourism enterprises, such as Huna Totem, Goldbelt, and Shee Atiká, contribute to local economies while relying on public lands for excursions and activities that extend beyond their private land bases. This impacts Forest Service management and priorities regarding road systems, recreation infrastructure, and the need to maintain the forest's scenic appeal. Smaller-scale tourism efforts, like those led by Kootznoowoo and Klawock Heenya, provide more localized opportunities but are similarly connected to the natural beauty and accessibility of the Tongass.

Some Tribes are extremely concerned with the pollution and environmental impacts associated with large scale cruise tourism, and have started water quality and air quality monitoring programs to protect the

health of subsistence resources. Tribes have voiced a desire for more balance when it comes to cruise tourism, and for increased local benefits from the industry.

Vandalism and Theft

Tribes are concerned that publishing more information about sacred sites will lead to more issues with unpermitted tourism, vandalism and theft. There are also concerns about vandalism and theft where recreation sites are located next to cultural heritage sites. Thus, there is a tension between not wanting to share information about sacred sites that could lead to increased exposure, and a need to know generally where these sites are so as to avoid them. The Forest Service has the authority to protect traditional ecological knowledge and culturally-sensitive information from being publicly released via the Freedom of Information Act. However, there are also examples of the Forest Service disclosing the location of sacred sites in NEPA documents, which decreases trust in the agency's capability to handle this sensitive information. Ranger districts can work with Tribes to build trust and a solid understanding of where culturally sensitive sites may occur, so that they can refrain from permitting special use permits or development projects in those areas.

Infrastructure and Deferred Maintenance

Tribes have expressed concerns about the ability of the agency to maintain infrastructure like roads and facilities that were originally built to support the timber industry. Many Tribes have incorporated USFS roads into their road inventories so that they can undertake maintenance responsibilities in order to keep roads open to important subsistence harvest areas. Some Tribes have expressed a desire to take over management of underutilized USFS facilities. The Organized Village of Kake has pursued an agreement of this nature in regards an old administrative building in Portage Bay. There are remaining concerns and questions around contamination that may be present around these facilities, and who is responsible for remediation.

Tribes want to be consulted and have broader community conversations whenever road closures are proposed, as this infrastructure has often become community assets that is used for subsistence harvesting after periods of resource extraction. Tribes and harvesters should be involved when prioritizing or determining road closures. A specific example is government-to-government consultation and increased public involvement in Access Travel Management (ATM) plans. The ATM section should include standards and guidelines on how to work with Tribes' Tribal Transportation Program with Federal Highway Administration in assuring important roads stay open, allowing for Tribal Transportation Funds to help with maintenance. ANCs would like greater coordination and management of Forest Service road easements that cross their land and are important to Tribal communities.

Tribes should also be consulted regarding the decommissioning of other public infrastructure, such as trails and cabins, to ameliorate concerns over impacts to subsistence harvesting access.

Restoration Priorities

There are Tribal and ANC-led community forest partnership efforts in Hoonah, Kake, Angoon, and Prince of Wales. Crews are receiving training and completing restoration objectives on lands managed by both the US Forest Service and Alaska Native Corporations. Tribes have expressed preferred contractor status to complete restoration work with local workforce.

In recent years, the Forest Service has prioritized land management that focuses on restoration of terrestrial and aquatic habitat, a shift that Tribes have broadly advocated for and supported. Restoration treatments that create good wildlife habitat are a priority for many tribes and examples of broad

collaboration with ANCs, the Forest Service, and entities like The Nature Conservancy and the Southeast Watershed Coalition should be built upon as examples of co-stewardship.

Tongass Fisheries Program

The Office of Subsistence Management's Fisheries Resource Monitoring Program (n.d.) (FRMP) is very important to Tribes for monitoring important subsistence fish habitat and populations. In Southeast Alaska, subsistence management is often under the purview of the Department of Agriculture rather than the Department of Interior due to the presence of the National Forest. Some of the FRMP reports, particularly those out of Hydaburg (Langdon & Sanderson, 2009) that were consulted for as part of the assessment process contain extensive accounts of traditional ecological knowledge. This knowledge and the monitoring that occurs have been used to help make in-season fishing management decisions by the Alaska Department of Fish and Game to avoid bycatch or incidental take of important subsistence species. Tribes have expressed support for this program to receive more funding.

Local Hire, Workforce, and Capacity Development

Many tribes and Alaska Native Corporations voiced support for the agency's ANILCA local hire efforts and preferred contractor status for Tribal and ANC entities. Per the direction provided by the APA petition (2020, 7): "The USFS should employ cooperative agreements, tribal authorities, challenge cost share agreements, partnerships, memorandums of understanding, and local hire when possible to increase workforce capacity amongst local tribal governments and the local community for fish, wildlife, timber, and infrastructure inventory, assessment, enhancement, and monitoring."

Workforce and capacity development is an issue that Tribes, the federal government, the State, and entitites across the region are facing that hinders the ability to implement programs and projects. This is a limiting factor for implementation of co-stewardship efforts as well. Tribes have voiced support for the establishment of Forest Service training centers in rural communities of the Central Tongass and Northern Tongass, similar to vocational-technical center on Prince of Wales that is operated by Tlingit & Haida, to reduce traveling costs and increase availability of learning, information, resources, and access to Forest Service representatives by local communities. Efforts for agency staff and Tribal employees to share learnings and develop capacity together can help both entities accomplish their goals.

Forest Service Staff Turnover

Constant transitions of Forest Service staff make it difficult to build trust and create good working relationships with Tribes. Many tribes have expressed frustration with the rate of turnover. It is recognized that there is also significant turnover within Tribes themselves, which can also complicate forming good relationships. Historical Forest Service practices that promote turnover and rotation of leadership, such as providing housing for a limited time period, need to be reviewed and changed when a more collaborative management approach in coordination with Tribes could lead to more positive Tongass Forest outcomes.

Information Needs

Information needs for forest plan revision include:

- An inventory of Cedar trees suitable for cultural use
- A non-timber forest products management plan, such as that being led by the Kayaani Commission for the Sitka area.
- Future direction on co-management and co-stewardship with Tribes

- Updated Subsistence uses data
- Tribal Consultation to verify and update of areas of known Tribal importance within the Tongass National Forest
- Consultation with Tribes to verify their preferred policies to address sacred sites and other areas of concern

Key Takeaways

History and Stewardship

- Tribes want the Tongass to be formally recognized as their traditional homelands, on which they have over 10,000 years of recorded history and stewardship, which Tribes still practice today.
    - Tribes conduct stewardship and land management through the trustee concept of clan ownership, in contrast to the western world concept of individual/private ownership, but somewhat in alignment with the federal construct of public lands and local caretakers.
    - Prioritizing the use of Indigenous place names is a great starting point that would allow for the integration of Indigenous knowledge within all management practices.
- The entire Tongass National Forest is an 'area of tribal importance.' All 16.7 million acres of the Forest are important to the Tlingit, Haida, and Tsimshian peoples and their representative federally recognized Tribal governments.
- The Tongass only exists due to the federal government dispossessing the Indigenous inhabitants of Southeast Alaska of their lands, through policies and practices that were done without their consent or consultation.

Management Priorities

- One of Tribes' highest priorities is to protect the traditional and customary hunting, fishing, and gathering areas within their traditional territory
- Tribes view 'food security' and 'food sovereignty' as a driving priority for land management, but these words are largely insufficient to capture what they mean to Tribal communities for the intergenerational transmission of culture, heritage, knowledge, values, work ethic, etc.
    - Managing for food security means prioritizing restoration of deer habitat and conducting any second-growth timber harvest in a way that supports robust deer populations, i.e. prescriptions that create heterogeneity on the landscape
    - It also means prioritizing restoration work in anadromous streams that hold high subsistence value for communities (not just conservation value for the forest overall)
    - Studying and determining restoration approaches that incorporate a pro-active climate lens is desired to address future anticipated issues with salmon productivity, including low dissolved oxygen content in streams and more sporadic and intense precipitation events
- Tribes want to see a holistic, ecosystem-based management approach that takes into account landscape level impacts and climate change impacts
- Broadly, most Tribes have expressed desire to pursue co-stewardship or co-management agreements for uses that occur on their traditional homelands. Their stated ultimate desire is equal

decision-making authority - 'co-management' or full management of what are currently the agency's responsibilities on their traditional homelands

  - This can include but is not limited to: subsistence fishery weirs, Mendenhall Glacier, bear viewing stations, special use permitting for tourism/commercial operations, commercial harvesting of non-timber forest products

- Management decisions, approaches, and activities should be done in a way that prioritizes protecting resources that are important to the Tribes
  - These resources include fish, wildlife, trees, all the components of a healthy ecosystem that are needed for Tribes to be able to practice their traditional way of life
- Almost every Tribe and ANC that met with the Tribal Engagement Team discussed the importance of cultural use wood and desire for increased access and long-term management of this dwindling resource. Tribes want to see a cessation of export of any trees that meet the characteristics of 'monument trees'
  - Tribes/ANCs want to work with the USFS to define the demand for, inventory, and design a long-term management plan for the continued provision of cultural use trees, as well as a funded harvest program for cultural use trees that meets current and future needs

Consultation/Trust

- Tribal Consultation and engagement: 'early and often.' Tribes want early consultation on all management and project consideration within their traditional homelands. This consultation should come at the phase when Ranger Districts are thinking about potential projects, even before scoping.
  - This will help avoid planning issues, such as overlapping recreation sites or log transfer facilities with important subsistence harvesting spots or sacred sites
- Broadly speaking, Tribes lack trust when it comes to working with the US Forest Service - in general - due to a history of broken promises, political pendulum swings, inadequate listening practices, and lack of reparations.
  - This does not prevent Tribes from working with the agency or seeking to better their relationships with individual district rangers or individual agency staff; rather, it is distrust of the institution as a whole
  - This distrust is compounded when agency staff lack understanding of the history of the relationship between Tribes, the USFS, and the federal government, and policies such as forced assimilation, burning and destruction of villages and seasonal use infrastructure
- The lack of trust is compounded by constant turnover within the agency. Ranger Districts should take efforts to become educated about whose traditional homelands they are stewarding, and the cultures and traditions of those people
  - Tribes are frustrated that someone who comes from outside and stays for three years has more decision-making authority over their traditional homelands, which their people have spent thousands of years stewarding - and still steward today.

Resource Concerns

- Tribes are concerned about the impacts from industrial-scale old growth logging, mining and contamination of local foods and waters, second-growth timber planning that mirrors the clearcut

and round-log export model, aging infrastructure, impacts of tourism (such as pollution, overharvesting, and invasive species), and protecting sacred sites

- Impacts to resources, way of life, and community safety from climate change are a top concern: landslides, invasive species, floods, erosion, fires, salmon stream temperatures and oxygen levels, changing berry patterns

Capacity Building/ Management Approaches

- Many Tribes have invested in building capacity for natural resource management and stewardship by tribal citizens. This 'all lands, all hands' approach to capacity development happens through community forest partnerships, the Alaska Youth Stewards crews, Tribal Conservation Districts, and the Southeast Alaska Indigenous Guardians network.
    - Tribes want to see the USFS support these efforts, participate within them, fund them, and invest in increasing local capacity to steward local lands.
- Tribes want to actively participate in the planning/execution of economic development activities on their homelands and ensure a balance between community priorities, local workforce opportunities, using local resources to support local livelihoods, and keeping funding circulating in the local economy

Alaska Native Corporation Priorities

- Coordinated land management, which includes forest fire and bug infestation mitigation, invasive species management and other avenues to utilize Good Neighbor Authorities (and other similar authorities)
- Coordinated planning, such as has gone on in the All Land Owners group, which has discussed planning use of infrastructure and roads to support both forest risks and second growth management.
- A long-term road management plan that addresses 17b-1 easements and the inclusion of community road use priorities, such as has occurred with the Forest partnerships.
- Economic opportunities that tie into land management, such as mariculture, which relies on road systems and storage on NFS lands, and tourism opportunities that offer the chance for ANC's to build tourism businesses that also depend on/utilize NFS infrastructure (like roads or bear viewing platforms)
- Workforce development coordination for all available jobs within Land management and second growth harvest.
- Long-term cultural use wood planning, such as coordinated inventory of remaining totem and canoe logs, a demand study, creation of a cost effective harvest plan that meets regional Tribal needs, and a long-term management plan to continue meeting needs into the future.
    - ANCs also prioritize increasing the knowledge of the economic value that comes from totem and canoe projects, with a view to highlighting the total cultural, economic and community impact of a sustainable access to totem and canoe logs.
- Land use designations that both protect forests, while allowing for exemptions for community priority projects, such as renewable energy, access to resources, and other economic opportunities tied to tourism.

Need for Change

Prior iterations of the Tongass National Forest land and resource management plan (Tongass Forest Plan) did not authentically include the perspectives or deep involvement of Alaska Native Tribes, Alaska Native Corporations, communities, or other Indigenous populations. Therefore, there is a need to change the Tongass Forest Plan to incorporate these perspectives, address the desired outcomes of these peoples, and for the federal government to honor its trust responsibility owed to Alaska Natives. Revising the Tongass Plan is the Forest Service's opportunity to respond to the 2020 Tribal petition for a Traditional Homeland Conservation Rule, and for the long-term management and protection of traditional and customary use areas on the Tongass by addressing several Tribal and Indigenous needs including but not limited to:

- Tribal/Alaska Native management of sacred sites including historical cultural sites;
- Facilitating Tribal subsistence use and stewardship of natural and cultural resources that contribute to food sovereignty and other cultural resources (e.g., salmon, cedar, deer, etc.)
- Ensuring Tribal and Indigenous access to terrestrial, aquatic, and marine cultural landscapes and ancestral homelands to facilitate the exercise of traditional and customary practices that reflect a reciprocal relationship between Alaska Native people and the land and resources they steward.
- Incorporating proactive and adaptive management to address the impacts of climate change on natural and cultural resources that are important to Tribes
- Providing opportunities for Tribes and Alaska Native Corporations to work with the agency to achieve land management outcomes, support Tribal and ANC economic development priorities, and develop the workforce capacity of Tribal citizens and ANC shareholders.
- Providing cultural use wood to Tribes and creating a long-term management plan for future generations

Using the forest plan revision process to address these and other Tribal desired outcomes would also partially address the need to repair and improve relationships between Alaska Native populations and the Forest Service and federal government, including but not limited to through improved government-to-government consultation, collaboration, and coordination with Tribes and Alaska Native Corporations. Improved government-to-government consultation, collaboration, and coordination will also begin to address the need to improve Forest Service understanding of Alaska Native issues, concerns, capacity, and desired outcomes of Tongass land management. An improved understanding and appreciation of Tribal sovereignty will facilitate the co-stewardship of natural resources and processes by Alaska Native people and the Forest Service, including by braiding western and Indigenous science to recognize, minimize, and mitigate the effects of climate change and past management on cultural resources.

Additionally, revising the Tongass Plan provides an opportunity to identify and designate lands as suitable for Tribal/native co-stewardship and eventual co-management. There is a need to integrate Indigenous languages and place names into maps and other landscape identifiers, and to develop management approaches at Tribal request for the restoration of Indigenous cultural properties and infrastructure including but not limited to fish camps, seasonal cabins, and smokehouses.

Appendix A: Areas of Tribal Importance

Haa Aani, Our Land: Tlingit and Haida Land Rights and Use (1998) is generally comprehensive in identifying the possessory rights of Alaska Natives in Southeast Alaska, and maps within the reference provide a broad accounting of areas where hunting, fishing and gathering activities occurred prior to 1947 when the book was first published. Listed below are some, but not all inclusive, areas of known tribal importance as extracted from literature for different Tribal communities. No information found for the Petersburg area.

Table 1. Angoon Area.

Broad Defined Area[1]	Activities	Uses
Point Marsden to Kootznahoo Head	Fishing, hunting, trapping	Village, graves
Kootznahoo Inlet	Fishing, hunting, trapping, berrying, gathering, gardening	Village, smokehouses
Hasselborg Creek	Fishing, hunting, trapping, berrying	Smokehouses
Killisnoo Harbor	Unknown	Village, graves
Hood Bay	Fishing, hunting, trapping	Smokehouse
Chaik Bay	Fishing, trapping, berrying, gathering, gardening	Village, smokehouses, graves
Whitewater Bay and Wilson Cove	Fishing, hunting, trapping, gathering	Village, smokehouse
Tyee Area	Fishing, hunting, trapping, berrying, gathering	Smokehouse
Herring and Chaplin Bays	Fishing, berrying, gathering	Fish camp, smokehouse
Ellis Harbor and Pybus Bay	Hunting, trapping	Smokhouse, cultural sites
False and Freshwater Bay, Tenakee Inlet	Fishing, gathering	Village, smokehouse
Basket Bay	Fishing	Smokehouse
Sitkoh Bay	Fishing, trapping, gathering	Smokehouses
Peril Strait	Fishing, hunting, trapping, berrying, gathering	Village, fish camp, smokehouses, cultural sites
Kelp Bay	Fishing, berrying, gathering	Fish camp, smokehouses, cultural sites, cultural trees
South Point to Red Bluff Bay	Fishing, hunting, trapping, gathering	Smokehouse
Hoggatt Bay to Cape Ommaney	Fishing, hunting, trapping	Smokehouse

[1]Other specific areas mentioned include: Cube Cove, Square Cove, Fishing Point, Lake Florence, Marble Bluffs, Parker Point, Favorite Bay, Kanalku, Mitchell Bay, Vllage Point, Chaik Point, Surprise Harbor, Loon Point, Palov Harbor, Wachusett Cove, Chatham, Poison Cove, Hoonah Sound, Dead Tree Island, Hanus Bay, Lake Eva, Saook Bay, Rodman Bay, Appleton Cove, Lindenberg Harbor, Crow Island, Middle Arm, South Arm, and Gut Bay.

Table 2. Chilkat Area (Klukwan).

Broad Defined Area[1]	Activities	Uses
Lynn Canal area	Fishing, gathering	Unknown

Broad Defined Area[1]	Activities	Uses
Chilkat River below Klukwan	Fising, trading	Village (2), fish/hunt camp
Klukwan area	Fishing, gathering	Fish/hunt camp, graves
Tsirku River and Chilkat Lake	Fishing, hunting, berrying, trapping	Smokehouse
Klehini River	Fishing, berrying, trading, trapping	Unknown
Chilkat River above Klehini River	Fishing, hunting, trapping, berrying, gathering, trading	Fish/hunt camp, smokehouses

[1] Other specific areas mentioned include: Endicott River and Lake, Echo Cove, Berner's Bay, Jones Point, Kicking Horse River, Takin, Wells, Dayei,Takhin glacier, Summit Creek, Nugget Creek, Aanwan Creek, Porcupine Creek, Dawson Pass, Big Boulder Creek, Mosquito Lake, Bear Creek, Kelsall River, many mileposts along Chilkat River

Table 3. Chilkoot Area (Haines).

Broad Defined Area[1]	Activities	Uses
Taiya Inlet	Fishing, hunting, berrying	Village (2), smokehouses
Taiyasanka Harbor	Fishing, hunting	Smokehouse
Chilkoot Lake area	Fising, hunting, trapping, berrying, gathering	Village, graves, smokehouses
Chilkat Peninsula	Fishing, hunting, gathering	Village, graves
East Coast of Lynn Canal	Fishing, hunting, trapping, berrying, gathering	Unknown
West Coast of Lynn Canal	Fishing, hunting, trapping, berrying, gathering	Fish/hunt camp, cultural sites
Chilkat River area	Fishing, hunting, trading	Unknown

[1] Other specific areas mentioned include: Dyea, Skagway area, Skagway River, Tlegu Beaach, Seduction Poin, Tanani Point, Nukdik Point, Berners Bay, Lace River, Endicott River, Sullivan Island, Pyramid Harbor and Murder Point.

Table 4. Craig Area.

Broad Defined Area	Activities	Uses
Crab Creek Watershed	Unknown	Unknown
Dog Salmon Creek Watershed	Unknown	Unknown
Doyle Bay	Unknown	Unknown
Klawock Lake	Unknown	Unknown
North Fork Lake	Unknown	Unknown
Port Saint Nicholas	Unknown	Unknown
Trocadero Bay	Unknown	Unknown

Table 5. Douglas Area.

Broad Defined Area[1]	Activities	Uses
Taku River	Fishing, hunting, trapping	Village (3), fish camps, smokehouses, graves
Taku Inlet	Fishing, hunting, trapping, berrying, trading	Village (3), Fish camps, smokehouses

Broad Defined Area[1]	Activities	Uses
Taku Harbor and Limestone Inlet	Fishing, hunting, trapping	Village, smokehouse
Port Snettisham	Fishing	Village (2), fish camp
Admiralty Island	Fishing, hunting, trapping	Village (2)
Douglas Island	Fishing, trapping, berrying	Unknown

[1] Other specific areas mentioned include: Lake Atlin, Nakina River, Sloko River, Canyon Island, Carlson Creek, Sunny Cove, Bishop Point, Thane, Dupont Creek, Sweetheart Lake, Mallard Cove, Point Amner, Speel River, Whiting River, Holkham Bay, Glass Peninsula, Gambien Bay, Brothers Islands, Seymour Canal, Kowee Creek.

Table 6. Hoonah Area.

Broad Defined Area[1]	Activities	Uses
Couverden Island	Fishing, hunting, trapping, berrying, gathering	Village, smokehouse, graves
Ashely Entrance to Excursion Inlet	Fishing, hunting, trapping	Village, smokehouse, graves
Excursion Inlet	Fishing, trapping, berrying	Village, smokehouse, graves
Pleasant Island and Gustavus	Fishing, hunting, berrying	Smokehouse
Glacier Bay	Fishing, hunting, trapping, berrying, gathering, gardening	Village (3), forts (2) smokehouse, fish camp, cultural trees
Dundas Bay	Fising, hunting, trapping, berrying	Village, fort, fish camp, smokehouse, graves
Lemesurier Island	Fishing, hunting, berrying	Village
Taylor Bay	Fishing, hunting, trapping, berrying	Village, smokehouses
Cape Spenser	Fishing, trapping, berrying	Smokehouse
Graves Harbor to Cape Fairweather	Fishing, hunting, berrying, gathering	Unknown
Yakobi Island	Fishing, hunting, trapping, gathering, gardening	Smokehouse, cultural trees
Inian Islands	Fishing, hunting, trapping, berrying, gathering	Village, graves
Lisianski Strait to Point Adolphus	Fishing, hunting, trapping, berrying	Village
Port Frederick	Fishing, hunting, berrying, gardening	Village, smokehouses, graves
Point Sophia to Point Augusta	Fishing, hunting, trapping, gathering, gardening	Smokehouses

[1] Other specific areas mentioned include: Swanson Harbor, Village Point, Porpoise Island, Strawberry Creek, Bartlett Cove, Beardslee Island, Bear Cove, Drake Island, Sandy Cove, Berg Bay, Point Carolus, Salt Chuck, Fern Harbor, Dicks Arm, Inian Pass, Cross Sound, Dry Bay, Icy Poing, Khaz Bay, Surge Bay, Soapstone Cove, Hoktaheen Creek, Takanis, Chatlheeni Creek, Stag Bay, Idaho Inlet, Mud Bay, Point Adolphus, Pinta Cove, Eagle Point, Game Creek, Seagull Creek, Neka Bay, Humpback Creek, Salt Lake Creek, Tenakee Inlet, Spasski Creek, Spasski Bay, and Whitestone Harbor.

Table 7. Hydaburg Area.

Broad Defined Area	Activities	Uses
Eek Lake Watershed	Unknown	Unknown
Hetta Lake Watershed	Fishing, Hunting,	Cultural Sites, Fish/hunt camp

Broad Defined Area	Activities	Uses
Hunter's Bay	Unknown	Unknown
Hydaburg Watershed	Fishing, Hunting	Cultural Sites, Fish/hunt camp
Kasook Inlet	Unknown	Unknown
Keete Inlet	Unknown	Unknown
Manhattan Arm	Unknown	Unknown
Natzuhini Creek	Unknown	Unknown
Reynolds Creek	Unknown	Unknown
Saltery Creek	Unknown	Unknown
Sukkwan Island	Unknown	Hunting, Cultural sites and Graves

Table 8. Juneau Area (Auke).

Broad Defined Area[1]	Activities	Uses
Berners Bay	Fishing, hunting, trapping, berrying	Village, smokehouses
Eagle River	Fishing, hunting, berrying	Unknown
Tee Harbor	Fishing	Fish camp
Auke Bay	Hunting, trapping, gardening	Fort, smokehouse graves
Lincoln and Shelter Island	Fishing, hunting, trapping, gathering	Fish camp, cultural trees
Gastineau Channel	Fishing, hunting, trapping, berrying, gardening	Village, smokehouses
Northern Douglas Island	Fishing, Gardening	Fish camp, smokehouses
Western Douglas Island	Fishing, trapping, berrying, gardening	Fish/trapping camp
Oliver Inlet and Seymour Canal	Fishing, hunting, trapping	Unknown
Young Bay	Fishing, hunting	Smokehouse
Mansfield Peninsula	Fishing, hunting, trapping, berrying	Village, smokehouse
West coast of Lynn Canal	Gardening	Gardening, graves

[1] Other specific areas mentioned include: Lace River, Steep Creek, Montana Creek, Mendenhall Glacier, Mendenhall Peninsula, Duck Creek, Jordan Creek, Lemon Creek, Gold Creek Sheep Creek, Thane, Dupont Creek, Fish Creek, Hut Point, Fritz Cove, Outer Point, Hilda Point, Windfall Harbor, Funter Bay, Hawk Inlet, Barlow Cove, and Swanson Harbor.

Table 9. Kake Area.

Broad Defined Area[1]	Activities	Uses
Seymour Canal	Fishing, hunting, trapping, berrying	Unknown
Mainland Point Highland to Hollkham Bay	Fishing, hunting, trapping, gathering	Village, fish camp, smokehouse

Broad Defined Area[1]	Activities	Uses
Northern Kuiu Island	Fishing, hunting, trapping, berrying, gathering, gardening	Fish camp, smokehouses
Central Kuiu Island	Fishing, hunting, trapping, gathering, gardening	Village (2), smokehouses, fort
Southern Kuiu Island	Hunting	Unknown
Red Bay	Unknown	Cultural Trees

[1] Other specific areas mentioned include: Pybus Bay, Brothers Island, Gambier Bay, POint Pybus, Thomas Bay, Windham Bay, Port Houghton, Hobart Bay, Roberts Island, Cape fanshaw, Fanshaw Bay, Portage Bay, Endicott Arm, Koo Island, Security Bay, Saginaw Bay, Washington Bay, Pillar Bay, Point Ellis, Port Camben, Kadake Bay, Keku Island, Tebenkof Bay, Gap Point, Port Malmesbury, Threemile Arm, Seclusion Bay and Conclusion Bay.

Table 10. Kasaan Area.

Broad Defined Area[1]	Activities	Uses
Thorne and Tolstoi Bay	Fishing, trapping	Village, smokehouses
Kasaan Peninsula	Fishing, hunting, trapping, berrying, gathering, gardening	Village (2), fish camp, smokehouses, graves, cultural sites
Karta Bay Area	Fishing, hunting, trapping, berrying, gathering, gardening	Village, fish camp, smokehouses, cultural trees
Twelve-mile Arm	Fishing, hunting, trapping, gardening	Unknown
Outer Point to Kasaan Point	Fishing, trapping	Trapping cabin
Skowl Arm	Fishing, hunting, trapping, berrying, gardening	Village (2), fish camp, smokehouses, fort, cultural sites
Cholmondeley	Fishing, hunting, trapping, gardening	Village (2), fish camp, smokehouses, fort, cultural sites
Port Johnson	Fishing	Fish camp
Adams Point to Cape Chacon	Fishing, trapping, gathering	Fish camp, smokehouses

[1] Other specific areas mentioned include: Jacob's Creek, Lindemann Creek, Linkum Creek, Poorman Creek, Salt Chuck, Son-i-hat Creek, Nichols Bay, Windfall Harbor, Lyman Anchorage, Hadley, Grindell Island, Itmine, Mt. Andrew, Paul's Creek, Salt Chuck, Sandy Point, Hollis Anchorage, Harris River, Kina Cove, Coal Bay, Baker Point, Kasaan Point, Long Island, Polk Inlet, Paul Bight, Old Tom Inlet, McKenszie Inlet, Khayyam Bay, Saltery Cove, Patteson Island, Sunny Cove, Gahi Bay, West Arm, South Arm, Dora Bay, Divide Head, Kitkun Bay, Chasina Point, Dolomi, Halibut Creek, Menefee Anchorage, Garder Bay, McLean Arm, Mallard Bay, Stone Rock Bay, and Brownson Bay.

Table 11. Ketchikan Area.

Broad Defined Area[1]	Activities	Uses
Tongass Village Area	Fishing, hunting, trapping, berrying	Village, smokehouses
Portland Canal Area	Fishing, hunting, trapping, berrying	Smokehouses
Canadian Territory	Fishing, gathering, trading	Fish camp
Annette Island, Duke Island	Fishing, hunting, trapping, gathering	Village (2), smokehouses, cultural sites
Southern Revillagigedo Island	Fishing, hunting, trapping, berrying	Fish camp, smokehouses

Broad Defined Area[1]	Activities	Uses
Moira Sound	Fishing, hunting, trapping	Fish camp, smokehouses

[1] Other specific areas mentioned include: Nakat Inlet, Willard Inlet, Sitklan Island, Fillmore Inlet, River Point, Halibut Bay, Tombstone Bay, Sandlfy Bay, Wales Island, Zayas Island, Nass River, Village Island, Cat Island, Gravina Island, Bostwick Inlet, Vallenar Bay, Carroll Inlet, George Inlet, Thorne Arm, Kegan Cove, Menefee Anchorage, Adams Point, Port Johnson, North Arm and Nowiskey Cove.

Table 12. Klawock Area.

Broad Defined Area	Activities	Uses
Big Salt Area	Unknown	Unknown
Klawock Lake Watershed	Unknown	Unknown
LIttle Salt Area	Unknown	Unknown
Sarkar River	Unknown	Unknown

Table 13. Saxman Area.

Broad Defined Area[1]	Activities	Uses
Cape Fox to Kah Shakes Cove	Fising, hunting, trapping, berrying, gathering, gardening	Village, graves
Boca de Quadra	Fishing, hunting, trapping, berrying	Smokehouses, cultural sites
Smeaton Bay	Fishing, hunting, trapping, berrying	Smokehouses, trapping camp
Checats Cove	Fishing, hunting	Fish camp, smokehouses
Rudyerd Bay	Fishing, hunting, trapping	Smokehouses
Walker Cove	Fishing, hunting	Smokehouses, hunting cabin
Chickamin River	Fishing, hunting, berrying	Fish camp, smokehouses
Burroughs Bay	Fishing, hunting, berrying	Village, smokehouses, cultural trees
Behm Narrows	Hunting, trapping	Trapping cabin
Yes Bay	Fishing, hunting, trapping	Village, smokehouses
Western Behm and Cleveland Peninsula	Unknown	Village
Southshore Revillagigedo Island	Fishing, hunting	Unknown

[1] Other specific areas mentioned include: Kirk Point, Tree Point, Hugh Smith Lake, Marten Arm, Short Point, Smeaton Island, Fox Point, Ella Point, Narrow Pass, Princess Bay, Tramp Point, Unuk River, Fitzgibbon Cove, Claude Point, Grant Creek Snipe Point, Bell Island, Short Bay, Lemesurier Point, Loring, Geroge Arm, Thorne Arm, Carroll Inlet and Tongass Narrows.

Table 14. Stika Area.

Broad Defined Area[1]	Activities	Uses
Pacific coast from Surge Bay to Dry Passage	Fishing, trapping	Smokehouses, cultural sites
Chichagof village area	Fishing, hunting, trapping, berrying	Village (2), smokehouses, fort
Khaz Peninsula and Slocum Arm	Hunting, trapping, gardening	Unknown

Broad Defined Area[1]	Activities	Uses
Peril Strait	Fishing, hunting, trapping, berrying	Smokehouses, cultural trees
St. John Baptist Bay	Fishing, hunting, trapping, berrying, gathering	Unknown
Krestof and Halleck Islands, Nakwasina Point	Fishing, hunting, trapping, berrying	Village, smokehouses
Kruzof Island	Fishing, hunting, trapping, gathering, gardening	Village, smokehouses
Katlian Bay and Lisianski Peninsula	Fishing, hunting, trapping, berrying, gathering	Village, smokehouses
Baranof Island around Sitka	Fishing, hunting, trapping, berrying, gathering	Village, fish camp, smokehouses
Redoubt Bay to Crawfish Inlet	Fishing, hunting, trapping, berrying, gathering	Smokehouses, fort
Necker Bay	Fishing, trapping	Smokehouse, trapping cabin
Whale Bay	Fishing, hunting, trapping	Smokehouses, fort
West Coast Baranof South from Whale Bay	Fishing, hunting, trapping berrying	Village, smokehouses

[1] Other specific areas mentioned include: Lisianski Strait, Porcupine in Ilin Bay, Klag Bay, Point Slocum Arm, Sister Lake, Rust Lake, Head Cove, Flat Cove, Tsimshian cove, Fish Bay, Deep Bay, Polson Cove, Ushk Bay, Patterson Bay, Fick Cove, Partofshikof Island, Allan Point, Point Brown, Port Kresof, Kalinin Bay, Shelikof Bay, Starrigavan Bay, Indian River, Jamestown Bay, Sitka River, Deep Inlet, Loon Island, Ilput Island, Kanga Island, Goddard, Biorka Island, Crawfish Island, Shamrock Bay, Rokovoi Bay, Small Arm, Port Banks, Great Arm of Whale Bay, Sandy Bay, Snipe Bay, and Redfish Bay.

Table 15. Skagway Area.

Broad Defined Area	Activities	Uses
Dyea.	Unknown	Unknown

Table 16. Wrangell Area.

Broad Defined Area[1]	Activities	Uses
Frederick Sound	Fishing, hunting, trapping, berrying	Village, fish camps
Stikine River	Fishing, hunting, trapping, berrying, trading, gardening	Village (2), smokehouses
Stikine River Flats	Fishing	Village, fish camps
Eastern Passage and Lake Channel	Fishing, hunting, trapping, berrying	Village, fish camp, smokehouse, graves, cultural sites
Zimovia Strait	Fishing, hunting, gathering, gardening	Village (2), fish camp, smokehouses, graves, cultural sites
Bradfield Canal	FIshing, trapping	Village, trap camp
Clevland Peninsula: Point Ward to Union Bay	Fishing, hunting, trapping	Fish camp, smokehouse
Southern and West Etolin Island	Fishing, hunting, berrying, gathering	Fish camp, smokehouses, graves
Thorne Bay north to Coffman Cove	Fishing, hunting	Smokehouse, fort

Broad Defined Area[1]	Activities	Uses
Kashevarof Passage	Fishing, hunting, gathering	Fish camp, cultural sites
Red Bay	Fishing, berrying, gathering	Fish camp, cultural trees
Southern Kupreanof Island	Fishing, hunting	Fish camp, smokehouse
Zarembo Island, Woronkofski Island	Fishing, hunting, berrying, gathering	Village, fort, graves

[1] Other specific areas mentioned include: Farragut Bay, Fanshaw Point, Bay Point, Thomas Bay, Point, Vandenput, Wood Point, Muddy River, LeConte Bay, Camp Island, Portage Bay, Blind Slough, Ideal Cove, Telegraph, Shakes Place, Katete River, Popof Glacier, Dry Island, Farm Island, Wrangell Island, Point Rothsay, Six-mile Point, Chichagof Bay, Babbler POint, Station Island, Deep Bay, Dry Straits, Coney Island, Mill Creek, Aaron Creek, Deadman Island, Deserted Village, Turn Island, Pat Creek, Anita Bay, Olive Cove, Whaletail Cove, Harding River, Anan Creek, Frosty Bay, Sunny Bay, Vixen Inlet, Deer Island, Union Bay, Menefree Point, Krogh Lake, Dewey Anchorage, Steamer Point and Bay, Quiet Harbor, Mosman Inlet, Thorne Island, Salmon Bay, Bushy Island, Bell Island, Duncan Canal, Point Barry, Totem Bay, Kasheets, McHenry Inlet, Tolstoi Bay, Luck POint, Point Colpoys, Lake Bay, Barnes Lake, Whale Bay, Exchange Cove, St. John Harbor, Roosevelt Harbor, Point Nesbitt and Ancon Point.

Table 17. Yakutat Area.

Broad Defined Area[1]	Activities	Uses
Icy Bay to Copper River	Fishing, hunting, trapping, gathering	Fish/hunt camps, smokehouses
Disenchantment Bay	Hunting, gathering	Seal camp
Yakutat Bay	Fishing, hunting, berrying, gathering	Village, graves
Ankau Inlet	Fishing, hunting, trapping, berrying, gathering, gardening	Fish camp, graves
Lost River	Fishing, trappng, berrying	Village, smokehouses, cultural sites
Situk River	Fishing, hunting, trapping, berrying	Fish camp, smokehouses, graves, cultural sites
Ahrnklin River	Fishing, hunting, trapping, berrying	Smokehouses, trap houses
Dangerous River	Fishing, hunting, trapping	Trap house
Italio River	Fishing, hunting, trapping	Village, Fish camp, smokehouse, trap house
Akwe, Ustay, Stihinuk, Kakanhini Streams	Fishing, hunting, trapping, berrying	Village, smokehouses, graves
Dry Bay	Fishing, hunting, trapping, berrying, trading	Village, smokehouses, graves

[1] Other specific areas mentioned include: Copper River, Grand Wash, Point Manby, Yeltze River, Mud Bay, Yaktaga, Kayak Islands, Esker Creek, Nunatak Fjord, Russel Fjord, Monti Bay, Khantaak Island, Knight Island, Dolgoi Island, Point Carrew, Summit Lake, Eleanor Cove, Bremners Creek, Seal Creek, and Dawn River.

Resources:

- Haa Aani: Goldschmidt and Haas
- POW Unified Watershed Assessment
- Hydaburg Traditional Sockeye Salmon Streams

Cultural Sites

- Fish traps, totem poles, petroglyphs

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