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UNITED STATES DEPARTMENT OF THE INTERIOR
OFFICE OF THE SECRETARY
GOVERNMENT TO GOVERNMENT

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UNITED STATES DEPARTMENT OF THE INTERIOR
OFFICE OF THE SECRETARY
GOVERNMENT TO GOVERNMENT
TRIBAL CONSULTATION SESSION (1)

Ketchikan Public Library
1110 Copper Ridge Lane
Ketchikan, Alaska 99901
August 3, 2018
10:30 a.m

1

P R O C E E D I N G S

2 10:30

3 MR. PELTOLA: Good morning. For all those who
4 don't know me, my name is Gene Peltola Junior. I'm
5 the Regional Director for the Bureau of Indian
6 Affairs, Alaska Region. Just a little bit about me. I
7 was born and raised in Bethel, Alaska. My mother was
8 Pamela Sea from Sitka. My father was Gene Peltola
9 Senior from the middle Kuskokwim. And on my mother's
10 side, my grandmother was (indiscernible) Wilson
11 (indiscernible) island and Ben Sea from Excursion
12 Inlet on my Dad's side my grandmother Katherine
13 Hoffman was from Ipper Kuskokwim and my grandfather
14 on my dad's side was a Finnish miner who came over to
15 Alaska (indiscernible). So I was born and raised in
16 Alaska. I just came off almost a 34 year career with
17 Fish and (indiscernible). Thank you all for coming.

18 MS. GILBERT: My name is Regina Gilbert. I work
19 out of Albuquerque, New Mexico. (Indiscernible)
20 Arizona, so I thank you for inviting us up here and
21 I'm enjoying this time.

22 MR. FISH: Thank you. So, with that we have a
23 couple of consultations for today. The first one
24 that we wanted to address with you is organization as
25 required under the Alaska IRA. So we have slated two

1 hours.

2 (Prayer offered)

3 MR. FISH: Thank you for providing that prayer.
4 So, our primary purpose with these initial meetings
5 is to discuss with you organization as a tribe as
6 required under the Alaska IRA. I think what we'll do
7 is kind of give you an underscoring of our
8 demonstration what our intention is for this meeting
9 and then open it up for discussion for the various
10 council that are here. I think a lot of you are
11 familiar with the Alaska IRA is an organization under
12 those provisions that are separate and distinct from
13 the (indiscernible) process. There's been a lot of
14 feedback that we received from -- at the department,
15 as well as internal discussions that the process is
16 kind of long and protracted and that there's no
17 formal guidelines on how to pursue it. So we're here
18 to discuss with you how the department can proceed in
19 a manner that has the best (indiscernible) for Alaska
20 Natives and the department in mind, and that we can
21 achieve the principal decisions that the department
22 can stand on firm ground so that we're not leaving
23 decisions up to the courts.

24 So, what we would like to do, I think before we
25 get started, some initial clarification is that we're

1 not here to discuss prior decisions or determinations
2 (indiscernible) by the department. This is solely
3 forward looking to future applicants, possibly
4 pending applicants that are currently under
5 consideration as well. I think that we -- and I hope
6 you all will see that your tribal leader letter we
7 sent out (indiscernible).

8 So, with that, I was going to turn it over to -
9 Matt do you want to say a few words.

10 MR. KELLY: This -- the point of the
11 consultation is to hear from you on the issues of
12 (indiscernible) laid out more clearly in the letters
13 that we sent out, and in particular those questions
14 that are outlined there. Input you can provide to us
15 on that would be of great value in determining how to
16 move forward, what is the best way to do it, and what
17 issues the department should be considering during
18 (indiscernible).

19 MS. APPEL: And I think I'll just add from a
20 regulations perspective for setting the federal
21 recognition process. We have the Part 83 regulations
22 that set out various standards, criteria and process
23 that you have to follow to get federal recognition
24 (indiscernible) process. But we don't have anything
25 similar, any regulations or any guidance for this

1 provision applicable to Alaska groups that would like
2 to be federally recognized and under IRA provision.

3 MR. FISH: So, if anybody has any initial
4 comments or questions, and we want this to be a
5 discussion and not necessarily a lecture, so if you
6 want to pose to questions for any of us on the panel,
7 you can certainly. We would ask that you come to
8 podium here, because we have a stenographer that's
9 memorializing all of our conversations here today for
10 a record. So --

11 MS. APPEL: And if you wouldn't mind stating
12 your name and affiliation so that we can capture that
13 for the record.

14 UNIDENTIFIED VOICE: Can I just ask, if you're
15 going to address the speakers, if you could speak a
16 little bit louder. It's a little bit -- it kind of
17 echos in here and so if you don't mind, just -- if
18 you could speak just a little bit louder, since we
19 don't have microphones.

20 MS. BURNS: Good morning. (Native language).
21 Delores Churchill, (Native language), Holly
22 Churchill, (Native language). My Haida name is
23 (Native language). In English I am called Gloria
24 Burns. I am the treasurer of Ketchikan Indian
25 Community who's the tribe for the Ketchikan area. We

1 stand on the land of the Sanyaa Kwaan and the Taant'a
2 Kwaan people, the traditional Tlingit people of area.
3 We're so appreciative to the people of Saxman who are
4 our neighbors for offering the prayer for
5 participating, and we're so thankful that you're
6 aware of our traditions and who is land ownership so
7 that you know the proper people to ask and to make
8 sure that it's done in a right way.

9 On behalf of the President of Ketchikan Indian
10 Community and our Tribal Council, we would like to
11 welcome you to our area and to say thank you for
12 bringing us here. We don't oftentimes have people
13 here in Ketchikan. And so I think as a result, we
14 have a few less tribes here, just because it never
15 occurs to people that there will be something in
16 Ketchikan where we might be able to speak.

17 I'd just like to offer a few comments, and I
18 don't really have any questions. I'd just like to
19 say this for the record.

20 The July 2nd, 2018 letter announcing the
21 consultation and setting forth the questions for
22 consideration is not clear in its description of the
23 purpose or intention of these consultations on
24 Section 16 of the Indian Reorganization Act. The
25 first part of the July 2nd, 2018 letter seems to

1 indicate that these consultations are designed solely
2 to address how the department might fairly respond to
3 unorganized groups seeking to organize and to be
4 recognized in the section of 16 tribes. The letter
5 states, in an effort to provide more clarity and
6 transparency to those groups seeking to organization
7 under the Alaska IRA, I am pleased to announce a
8 listening session and serious of consultations to
9 help in Alaska in the upcoming months to discuss how
10 the department might better implement the statutes in
11 the acknowledgment provisions.

12 On that issue, new groups seeking to organize,
13 Ketchikan Indian Community has the following
14 comments:

15 KIC is a Section 16 IRA tribe and has been since
16 1940. Our only concern is that any procedures that
17 acknowledge any new groups of American Indians and
18 Alaska Natives as newly recognized IRA tribes should
19 be done in a way that does not disrupt existing
20 authorities and relationships for existing tribes.
21 We know see -- we see no reason why the existing
22 federal acknowledgment process in 25 CFR Part 83
23 cannot continue to be applied to any new groups
24 petitioning for tribal recognition in Alaska in the
25 same way that Part 83 is applied for any new groups

1 in the Lower-48.

2 Thank you so much. (Native language).

3 MS. APPEL: Thank you for those comments. And
4 if we fail to say thank you for -- we all really
5 appreciate being able to come to your homeland and
6 speak with you here. It is -- it is rare that we get
7 out to this area. So we appreciate the opportunity.

8 MR. COOK: Good morning. My name is Clinton
9 Cook. I'm the tribal president of the Great Tribal
10 Association. I'd like to welcome you to Southeast.
11 I'd like to welcome the tribal leaders who made it
12 from around Southeast. I appreciate your guys'
13 attendance. It's huge to have tribes come speak on
14 their behalf of their people.

15 Mr. Fish went over it briefly. I didn't really
16 hear you very well when you were talking, but can you
17 confirm that the IRA consultation you are doing only
18 concerns Alaska Native groups that are not currently
19 federally recognized? The Craig tribe, KIC, Saxman,
20 Central Council, we're all under the IRA. I am
21 asking for you express and unequivocal confirmation
22 that this consultation does not concern our authority
23 as federally recognized Indian tribes. This has been
24 stated in the Juneau and Fairbanks sessions, but I
25 want to hear it firsthand from you.

1 MR. FISH: Excuse me for speaking a little bit
2 lowly. I'm a former marine so I've either got the
3 high end or the very low end. So, I can speak up for
4 you here. This consultation is solely considered of
5 future applicants and potentially pending applicants
6 for organization under the Alaska IRA. So, yes, I
7 would confirm what -- what you were told in Juneau,
8 it stands true at this time as well.

9 MR. COOK: Okay. The next question I have is,
10 tribal leaders expect government to government
11 relationships with Indian affairs leadership, not
12 lawyers. Where are your leaders in the In -- within
13 the Indian affairs today?

14 MR. FISH: Where are our leaders with Indian
15 Affairs sounds like?

16 MR. COOK: Yes.

17 UNIDENTIFIED VOICE: So, we regret that
18 Principal Deputy, Assistant Secretary Tashuda wasn't
19 able to make it to this one. He was in Juneau
20 yesterday and he called away for some business with
21 the -- with the Secretary. You know, your new
22 Assistant Secretary, Ms. Sweeney is now on board, and
23 she had some on-boarding duties to take care. So I
24 send, you know, their greetings and regrets that they
25 couldn't be here with you today, unfortunately they

1 were occupied.

2 MR. COOK: So he invited me and then did not
3 show. Correct?

4 MR. FISH: He got called away. Yes, sir.

5 MR. COOK: Thank you.

6 MS. DEWITT: Good morning. My name is Nora
7 Dewitt and my Tlingit name is (Native language). I
8 represent the organized people of Saxman. I serve as
9 treasurer. First of all, I'd like to thank Gloria
10 for her graciousness this morning, and welcome to all
11 the tribal leaders and to yourselves.

12 This issue, I -- I speak from my heart. Because
13 just like in D.C., you're having various difficulties
14 with politics. This particular issue is going to do
15 the same for Indian country in Alaska. I -- I don't
16 disagree that tribes who meet some of the descriptive
17 features that are in the -- the IRA process should --
18 should not be allowed, but I do want to stress that
19 the short notice has really left us at a
20 disadvantage.

21 In Saxman we really like to consult our elders.
22 We also, in issues that are of an extreme nature, we
23 call in the clan leaders and we meet with them. And
24 we hear what they have to say. And in this
25 particular issue, Saxman was organized under the

1 common bond of jurisdiction, or land. We have one
2 mile square.

3 What this would do is, within our community we
4 know of one tribe. I mean, not one tribe, but one
5 clan that at one time seeked [sic] and IRA structure.
6 In Ketchikan, we know of one tribe that also has done
7 that. That one tribe in Ketchikan also reaches out
8 to Saxman, because their membership is out there.
9 So, if the common bond language that you're speaking
10 isn't going to be to the land, but to clans, then
11 it's going to be a big issues for the tribes. It
12 took this long -- well, not really not this long, but
13 it took -- no, I -- I will take that back. It took
14 this long for the tribes to really take a look at
15 their constitution and see what fits and what doesn't
16 fit and to seek amendments and changes that fall for
17 whatever their government structure is at present.
18 Saxman is undergoing that right now, to go over our
19 constitution. If we're going to be doing this, we
20 really need more time. We need to talk with the
21 clans and we need to talk with the elders. And we
22 need the time, because they - they don't understand
23 sometimes the issues, and it's going to be take -- it
24 will take one-on-one in some instances to bring
25 everybody up to the level of understanding, and then

1 to do a community leading where we can make a
2 decision on whether this is best for Saxman IFF one
3 of the clans decides to con -- to pursue tribal
4 status under the IRA Act.

5 So, I just caution you that in Saxman's case we
6 have not had enough time to do due diligence to our
7 citizenship in responding to these questions that you
8 set forth. Thank you.

9 MR. FISH: Thank you for those comments. I
10 don't think that we're precluded from adding
11 additional consultation dates to the schedule if
12 deemed necessary. So, we certainly want to get your
13 formulated views on -- on our approach to -- to this
14 particular issue. Thank you.

15 MS. DEWITT: Thank you.

16 MR. WALLACE: Kind of an awkward silence when
17 people aren't lined up for the microphone. President
18 Lee Wallace, Organized Village of Saxman. Earlier
19 this morning I requested that we get started at 10:00
20 a.m. I like promptness. And we started about 10:30,
21 is what we did. In our day-to-day tribal government
22 we tend to a lot of different things, a lot of
23 different issues. And what I want to speak about is
24 the letter dated July 2, 2018.

25 It's a Dear Tribal Letter, and it's talking

1 about the IRA and some unrecognized groups wanting to
2 be recognized. I guess my question to you folks is,
3 what are the names of the groups that have been
4 requesting this action? Has there been one? Two?
5 Many? What are their names?

6 MR. FISH: My understanding is that there have
7 been three requests that have been pending some time
8 I personally don't know the names of the groups that
9 are waiting.

10 MR. WALLACE: Okay. So about three groups,
11 right?

12 MR. FISH: That's my understanding.

13 MR. WALLACE: Okay. And further down the
14 letter, in your paragraph, it says, in an effort to
15 provide more clarity and transparency, those groups
16 seeking organize under the Alaska IRA, I am pleased
17 to announce a listening session and to provide more
18 clarity and transparency. Instead, you send the
19 letter to all us federally recognized tribes for this
20 attention. My viewpoint, you should be having that
21 consultation with those unrecognized groups. There's
22 a process that went into place with Alaska IRA, and
23 many of our recognized, federally recognized IRAs,
24 they went through that process back in 1936, '37.
25 That process worked. Although it may be archaic at

1 this time, just like you look at some of the tribal
2 constitutions that haven't been revised; they're very
3 archaic and need to be revised. And maybe there is a
4 little fine tuning in the process. But I think --
5 first of all, I'll back up and I want to give my
6 congratulations to Gene in his new appointment. I've
7 worked with Gene throughout many years at the federal
8 subsistence level, gaining Saxman's rural status and
9 Gene was all part of that.

10 And so, but that, I think the Alaska region BIA
11 needs to be working with those groups that are
12 applying and go from there. And really, why -- why
13 involve the recognized tribes? I don't really see no
14 reason for it.

15 And I'm going to talk more about the -- the
16 letter, the second page, which caught our attention
17 was -- was the different meetings throughout the
18 state in the different regions. You -- you call for
19 a listening session, call for a public meeting, ANC
20 consultation and tribal consultation. Ketchikan's
21 listed as tribal consultation. But my question is,
22 why all the different sessions and the names? Very
23 different meanings to each one of them. Let's get to
24 the tribal consultation.

25 Now, I'm asking for your department's tribal

1 consultation policy. Do you have one? I'd like you
2 to share with each tribe, if you haven't already. I
3 haven't seen it. Earlier on this year, with the new
4 -- new administration, and discussions with the
5 Department of DOT, they didn't have a real tribal
6 consultation policy. You back -- you go back four
7 more years, you know, when Obama came into office,
8 one of his first executive orders was to, I want each
9 agency to have a tribal consultation policy. And
10 from that, there was a network of how to go about
11 things. In a true policy -- consultation policy,
12 this July -- these July meetings and August meetings
13 and actually all these meetings listed, you'd have
14 dialog with each and every tribe in Alaska. To pick
15 a date, what works for you. Here we are in August
16 and June, July, August, September, we're -- we're --
17 period of time when we're -- we should be out
18 fishing. Right now we're in the hunting season, if
19 you're in the rural. Gathering berries, gathering
20 firewood, getting your fish supply for the winter.
21 And here we are in a so-called consultation, which
22 I'm really questioning, and so the question is, Mr.
23 Kelly and Mr. Fish and Liz, are you three really
24 decision makers? That's my question to three of you.

25 MR. FISH: I'm not a final decision maker, what

1 I would say that I think that I support decisions
2 within the department. Yes, sir.

3 MR. WALLACE: Okay. Kelly?

4 MR. KELLY: As a attorney - we don't make
5 decisions. We advise our clients who make the
6 decisions.

7 MS. APPEL: I would say I'm an advisor.

8 MR. WALLACE: You are?

9 MS. APPEL: An advisor to the decision maker.

10 MR. WALLACE: My reason in asking that question,
11 for all these years with the Saxman fighting the
12 rural determination process, and that -- that was
13 almost a decade of -- of meetings and consultations.
14 And at one time I called for a consultation with the
15 FSB board. Made my formal request. I'm going to be
16 in Anchorage at this date and I want to meet at U.S.
17 Fish and Wildlife Service in their conference room.
18 I and about four other tribes showed up and we met in
19 the conference room and I looked at the table, and I
20 said I don't see any decision makers. There's no
21 sense us talking if there isn't a decision maker at
22 the table. And so that's why I'm asking that
23 question. You know, if you guys aren't the decision
24 makers, maybe all us tribal leaders are -- are
25 wasting our time and we should be doing other things.

1 Because the proper way was to, again, contact the
2 tribes and say what dates would really work best for
3 -- for all of you tribes in Alaska?

4 Now, Gene, with his agency, they are BIA
5 providers. It's usually the end of November. That
6 would have been a good time possibly to meet with --
7 meet with a lot of tribal governments throughout
8 Alaska.

9 Another big meeting is AFN. Well attended by
10 many people throughout Alaska. And I look at some of
11 these dates and some of these dates are day before,
12 day after the AFN meeting. Possibly it could have
13 been really part of AFN or BIA providers. That's the
14 time you're going to have input. My question to you
15 -- let's see, this is -- how many -- what's this, the
16 third session here? You had Fairbanks, Juneau,
17 Ketchikan. So, my gut feeling is you're not really
18 hearing the voice of the majority of 229 federally
19 recognized tribes in this process that was outlaid
20 here, with this July 2nd letter.

21 So, really think of really rescheduling some
22 other of those meetings where you're going to have a
23 lot of contact with tribal leaders. Because I think
24 as you're going to do now, you're going to be
25 hitting, missing of the 229 you're not even going to

1 have a majority of them. But I think the majority of
2 them think probably are thinking the same way. It's
3 like, some of them in the summertime even have
4 recess. They don't even meet. Because you know
5 what? Summer's here, it's harvest time. Some of
6 them may have not even seen that email that came
7 through the email. Maybe that's why some of them
8 didn't show up. They're busy attending to catching
9 their fish, drying their fish, freezing it, storing
10 it for the winter. So right now, again, we're in
11 deer hunting season and also moose season -- moose
12 season's coming up for regions. And in the interior
13 you've got the caribou and you've got the moose. So
14 I'm just kind of really upset at the timing of it.
15 Of writing a letter July 2 and let's throw these
16 dates and this is when we want to meet with the
17 tribal groups in Alaska. Shouldn't have been done.
18 Should have had consultation to find those dates.

19 There are -- there is a number of questions that
20 you guys want -- wanted the tribes to consider. A
21 lot of them are probably legal. Most tribes, like
22 Saxman, are very small. We don't have a legal
23 counsel. Can afford one. And some of those are
24 really legal questions to ask. But there are some
25 that are -- are probably easy enough. The first

1 question, the answer to that is yeah. Sax -- Alaska
2 IRAs are relevant today. And they're relevant to the
3 end of time.

4 Question 6, the answer to that briefly, is CFR
5 Part 81 can guide for secretarial elections and
6 together with the secretary 1930 instructions.
7 Gene's staff in Alaska, they could probably process
8 those three groups that are wanting to be federally
9 recognized.

10 And the answer to number 9, there's really no
11 need. There's -- again, I said there was a process
12 that happened in '36, '37. It may take a little
13 work, but hey, roll up your sleeves, Gene, and work.

14 So, I said, you know, again, I'd rather be doing
15 some fishing or hunting right now. And that's why
16 probably some of our council members on the council
17 are not here, because it's that time of year. But I
18 thought it was important enough for me to come to
19 tell you that this was a whole backward process of
20 not involving us in scheduling dates. (Native
21 language).

22 MR. FISH: Mr. President, if I may? I just
23 wanted to say we don't intend any disrespect to your
24 schedules here. We wanted to get a conversation
25 started and so we persued an ambitious schedule for

1 that. As I mentioned earlier we certain that
2 (indiscernible), and to the extent that we can
3 accommodate your schedule I think we would like to do
4 that. I regret that Mr. Tahsuda wasn't able to make
5 it here for this one today. He had every intention
6 of being here today to hear your comments and discuss
7 this with you, so I regret that -- I'm filling in for
8 him at this point in time, but you can consider me
9 the point of contact for him back in D.C. I'll share
10 my contact information with you. If you'd like to
11 send him a message, I can take your sentiments back
12 with me. Thank you for your comments, sir.

13 MS. PATA: (Indiscernible). My English name is
14 Jacqueline Pata. My Tlingit name is (Native
15 language). I am from the Raven Sockeye House from
16 Haines, Alaska. And I'd like to thank the host here
17 today for allowing us to come and visit in your
18 communities and to be able to be present today.

19 Although I am the Second Vice President for
20 Tlingit and Haida Tribes of Central Council, I am
21 today speaking on behalf of my other job, which is
22 the Executive Director of National Congress of
23 American Indians. And I would like to provide a few
24 comments.

25 NCAI has had a history of working through trying

1 to resolve some of the challenges of the federal
2 recognition poli -- process. In fact, we spent years
3 and years. We developed a federal recognition task
4 force to be able to work very closely with the
5 administration to improve some of the challenges that
6 we had of prolonged decision making, lack of
7 transparency in the process, inordinate amount of
8 cost to do the archeological and other, you know,
9 data to support those federal recognitions
10 applications that were going forward. And in, you
11 know, in the recent last five -- decade -- five years
12 ago, we -- we've been able to improve that process to
13 a place where at least people knew what the time
14 lines were and what that -- and what the frames --
15 where they were in the process and how it progresses
16 for moving forward.

17 We are very concerned about proposed legislation
18 that congress is considering around a political
19 process that could actually circumvent or the -- the
20 thought process, the administrative process. We are
21 very concerned because we recognize that one of the
22 challenges in the federal recognition process and one
23 of the reasons for so many prolonged delays was the -
24 - was the political interference of local
25 governments, other interested parties, that would

1 create tensions around a process that should have
2 been put in place, recognizing the tribes based upon
3 their historical ties and connections and -- and
4 their body of government or their body of continued
5 structure as a -- serving as a tribal government.

6 So, I wanted to be able to bring that up,
7 because as we look at this particular proposal for
8 consultation today, we recognize that it is important
9 -- first of all, the three tribes in question, or
10 that are -- have had a long -- prolonged process
11 within the administration, and that has been noted,
12 that all tribes should be treated fairly in a process
13 and the process should be well founded. And I think
14 that that's important. And I recognize that that's
15 one of the reasons for you putting forward this
16 consultation today.

17 The other thing that's important, though, is
18 recognizing that there has been many decisions around
19 existing tribes and many -- and because of our
20 convoluted history with the federal government you
21 see in many cases tribes in other parts of the
22 country where there has been difficulty with
23 identification of not groups or subgroups that
24 sometimes are fractionated, created by some other
25 turmoils, and we want to be able to make sure that in

1 a process that -- that we recognize, just as it does
2 in Part 83, that there is recognition or a review to
3 make sure -- to ensure that these are not factions of
4 other tribes that are seeking recognition for other -
5 - for reasons beyond that -- more contemporary
6 reasons, let's put it that way -- for more
7 contemporary reasons. And so we feel like -- so we
8 recognize that it's important to notify and consult
9 with the -- those affected tribes -- potentially
10 affected tribes. However, as we stated earlier, I
11 think by Lee Wallace very adequately, that the tribes
12 in this matter should be the ones that should be
13 having the primary conversations with, to resolve the
14 issues around recognition.

15 It's unfortunate that some tribes have to seek
16 political recognition and as we were all celebrated
17 the -- the recent recognition of the six tribes in
18 Virginia, long overdue, but they had to seek
19 political recognition because the process didn't --
20 was -- the process was not able to resolve their
21 challenges after many, many years. And so we
22 recognize that there will always be some of those
23 that, for whatever reasons, may have to take
24 alternative routes to get to the end result. We
25 still feel that the fact process is solid and a good

1 approach for addressing some of the concerns. And so
2 it -- and so I won't speak to what process would be
3 best for Alaska. I think Alaska tribes need to make
4 that decision. But I do feel that a transparent
5 process with time certainty is important for -- for
6 everyone.

7 In addition to that, I want to also -- and NCAI
8 has resolutions that I will provide to you later in
9 our support for some of these provisions that I'm
10 talking about today. The other thing that I wanted
11 to mention, as I did the other day, was I wanted to
12 mention that my concern around question number 4, and
13 the way that it was stated and framed. And really,
14 the reason I want to bring that up is because I have
15 great concern in just the sharing of a common bond of
16 occupation that have the ability to exercise
17 sovereign governmental powers. And I really believe
18 that it is the framing that makes we concerned as we
19 have these dialogs, and to recognize that tribes are
20 sovereign and have inherent sovereignty, and that the
21 federal government's responsibility is to recognize
22 that authority for the tribes to exercise that
23 sovereign governmental powers. And so, I want to be
24 able to make sure that as we move forward in dialogs
25 of consultations and in dialogs with this

1 administration, that we continue to recognize those
2 sovereign authorities of tribes to be able to make
3 their -- over their governmental powers that isn't
4 bestowed to them by the federal government by acts of
5 congress, but that they -- that they have that
6 inherent sovereignty. So, I wanted to be able to
7 place that -- put that also in the record for these
8 conversations.

9 So, once again, thank you for coming to Alaska.
10 I think it's important to have these conversations
11 with the tribes that are -- would be affected. And,
12 you know, not much is known about the tribes, why the
13 delays are in the tribes that are seeking
14 recognition. It's difficult for us tribal leaders in
15 Alaska, for us to speak of things that we don't know
16 of, nor do we know the consequences of one decision
17 or not, the Alaska IRA process or -- or being able to
18 look at the other federal acknowledgment of process
19 of Part 83. And so, as you can tell, it creates
20 challenges in responding to the questions as you have
21 laid them out. Thank you very much. (Native
22 language).

23 MR. MICKLIN: (Native language). My Tlingit
24 name is (Native language). My English name is Will
25 Micklin. I'm Third Vice President of the Central

1 Council of Tlingit-Haida Tribes of Alaska. I am a
2 citizen of the Taant'a Kwaan, the Tongass tribe.
3 This is the aboriginal territory of the Tongass
4 tribe. My -- our head Sadi (ph), Butch Jackson, was
5 our head Sadi (ph). And my family is here, buried on
6 Pennock Island and in these places. Mother's mothers
7 from time beyond memory lived here. They --
8 Ketchikan was a humpy creek owned by Gaanax adi. A
9 person of the Gaanax adi clan floated a shore house.
10 We lived at -- on our winter island. Our winter camp
11 was in -- was Annette Island, which is now
12 Metlakatla, Takani (ph) tribes. The name of my
13 auntie, she's the -- a woman of our winter village
14 and my grand -- one of my grandmother came was
15 (Native language) and that's the Shining Sands, the
16 sands that shine with a golden light in the sunlight,
17 and it's by Point Chaka (ph).

18 So, we have a deep history and culture in this
19 area. We were the -- we were the Taant'a Kwaan, is
20 our name, closely tied with the Sanyaa Kwaan. The
21 Sanyaa Kwaan in Saxman. Today, Taant'a Kwaan,
22 between Saxman and Ketchikan, and I'm a (Native
23 language). And child of the white man, a grandchild
24 of there, and the Gaanax adi Raven. And I say this
25 because there are -- it's important to understand the

1 construct of identity. We are self-identified, as
2 Taant'a Kwaan and Sanyaa Kwaan. We are close --
3 closest relations are, by intermarriage are the
4 Haida. The Haida of Howkan Island. And Chief Skulka
5 lives here in Ketchikan. So, we are self-identified.
6 We existed from here in this area, whether from -- at
7 Cat Island, where we were for a time, or Long Island
8 or Fort Chester on Annette Island. We are -- or at
9 Fort Tongass, when that was a -- a military facility.
10 So, we've been here and we are known by ourselves and
11 identified by ourselves. We identify and recognize
12 and affirm our brothers and sisters who are --
13 whether they be our opposites on the Raven side from
14 us who are Wolf, or today known as Eagle. Whether
15 they are within our Kwaan, Taant'a Kwaan or other
16 Kwaans from other houses. I'm Katsit (ph). He's the
17 man who married the bear. There are other houses on
18 the Wolf side and there are houses on the Raven side.
19 We also identify those in other Kwaans like Sanyaa
20 Kwaan or in other tribes like Haida. And we have
21 representatives of all of them here today. We are
22 not in conflict with the identification that we've
23 adapted by virtue of Western law. The KIC, Ketchikan
24 Indian Community, is an IRA. Saxman is an IRA. We
25 recognize and accept them for what they are. They

1 are traditional, indigenous peoples, governed by
2 themselves, from time beyond memory, adapted to the
3 legal construct available to us in order to further
4 the interest of our people.

5 Central Council is a regional tribe. We were
6 not created by the IRA. We were self-identified. We
7 actually emerged from the Alaska Native Brotherhood
8 and Alaska Native Sisterhood, organized by our clan
9 leaders in 1912, and organized under the Act of 1935.
10 In 1935, in order to organize as Central Council, in
11 order to litigate with the United States over our
12 trespass suit for violation of our interest in
13 Southeast Alaska for uncompensated takings of our
14 aboriginal title, against our aboriginal title, which
15 was affirmed in the court of claims decision between
16 1958 and 1965.

17 We organized ourselves by that, in collaboration
18 with the United States and have continued in that
19 fashion. We believe it's important that those
20 constructs be respected as a reflection of
21 aboriginal, indigenous, inherent sovereign authority
22 that is uninterrupted from our ancestors to today.
23 And that those current constructs come with it, an
24 obligation of the United States to continue the
25 agreements and the constructs that were entered into

1 as we move forward through time, and that new
2 administrations not look back to prior and try to
3 reform, re-trade, renegotiate, reinterpret those past
4 agreements, which were based on the shoulders of our
5 elders and their ancestors that came before us, and
6 involved significant consideration.

7 So, for the topic today, the -- the IRA and its
8 Section 16, I'll remind us all that the tribal
9 sovereignty is affirmed under the Indian
10 Reorganization Act of 1934 and it's 1936 amendment,
11 extending those same agreements to Alaska tribes.

12 In 1993, acting pursuant to the authority
13 delegated it -- to it by congress, the Department of
14 Interior published a list of Alaska Native villages
15 that were federally recognized as Indian tribes with
16 inherent sovereignty, that possessed the same status
17 as tribes in the lower 48 states, and that function
18 as, I'm quoting, political entities exercising
19 governmental authority. The Department of Interior
20 emphasized that the purpose of the publication was
21 to, and I'm quoting again, expressly and
22 unequivocally acknowledge that Alaska Native village
23 and regional tribes included on the list were
24 recognized as political entities and retained their
25 inherent sovereign authority. It further stated that

1 by the time of enactment of the IRA, the Alaska
2 Natives were subject to the same legal principles as
3 Indians in the contiguous 48 states and had the same
4 powers and attributes as other Indian tribes. The
5 purpose of the current public -- that publication,
6 current in '93, is -- was to publish an Alaska list
7 of entities conforming to the intent of 25 CFR
8 83.6(b). And I'll come back to Part 83. And to
9 eliminate any doubt as to the department's intention
10 by expressly and unequivocally acknowledging that the
11 department has determined that the villages and
12 regional tribes listed are distinctly Native
13 communities and have the same status as tribes in the
14 contiguous 48 states.

15 The BIA's 1993 notice recognizes Alaska tribes,
16 I'm quoting again, status as Indian tribes with a
17 government to government relationship with the United
18 States. They have the right, subject to general
19 principles of federal Indian law, to exercise the
20 same inherent and delegated authorities available to
21 other tribes. The BIA notice designates --
22 designated Alaska's tribes as political entities
23 exercising governmental authority. The BIA
24 recognized the same governmental power and immunity
25 from state law enjoyed by a tribe on a continuing

1 Indian reservation.

2 The federal -- the federally recognized Indian
3 tribe list of 1994, enacted the following year,
4 really in response I -- in my view, to the Sansonetti
5 opinion of January 11th, 1993, but for -- not for
6 purposes of our current discussion -- is legislation
7 that mirrors the language of the BIA 1993 notice,
8 announcing that the United States, again I'm quoting,
9 maintains the government to government relationship
10 with the recognized tribes and recognizes their
11 sovereignty. The '94 tribe list act is a statute
12 enacted for the benefit of Indians and must be
13 interpreted under the Indian canons and as settled
14 law, unambiguous, is not available to chevron
15 deference for a reinterpretation by the
16 administration that would prevail over the plain
17 language of the act of the bureau's prior expression
18 in this area from the 1993 list.

19 So, I'll note that the '94 act, sponsored by
20 Senator McCain, reaffirmed the recognition of Central
21 Council as a -- as a federally recognized tribe,
22 equivalent again, to all tribes in Alaska and tribes
23 in the Lower-48 that have the same powers of
24 government, immunity and other attributes of a
25 sovereign.

1 So, as to the Part 83 that I previously alluded
2 to, that does seem to us to be available, as Vice
3 President Pata mentioned, for questions of factions
4 or splinter groups that would assert that they are
5 indeed the recognized, duly recognized government of
6 a people, that that is available for -- to resolve
7 these issues, and a reinterpretation of the IRA
8 Section 16 seems inappropriate, if not inapplicable
9 to that task.

10 So, to me, that seemed to be the operative
11 question in the -- among those put to -- to tribes on
12 -- in the dear tribal leader letter. And our
13 position is that the -- the Section 16 should be left
14 for the purposes that -- that it -- it utilizes and
15 that a -- there is not a need for a -- to bring it
16 contemporary to today's law, in that the basic
17 principles of federal Indian law have not changed
18 substantive to a re-look at Section 16. There have
19 certainly been, and we can have a long list of
20 substantive decisions that have occurred, but do not
21 really seem to be on point to an effort -- to the --
22 a goal that would achieved by reexamination of
23 Section 16. There are many articles in U.S. code
24 that are not contemporary that may be -- may have
25 been better utilized in a prior era, and yet the task

1 of redrawing the landscape for a contemporary view of
2 those -- of that -- of a particularized process seems
3 inordinately burdensome and could pose unintended
4 consequences that would not serve the interest,
5 either of our trustee nor of your trust
6 beneficiaries, the tribes that stand before you and
7 all those that stand behind us but could not be here
8 today to express their views.

9 So, I just want to emphasize that we respect
10 every tribe that is organized and established, and we
11 recognize them as peers, without any gradation of
12 sovereign power or authority or a question of their
13 -- the inherent nature of their powers of governance.
14 We are all federally recognized tribes and equal
15 under federal Indian policy and the Indian
16 Reorganization Act, the 1993 list by the BIA, and the
17 1994 tribal list act all have that same consistent
18 expression and our recommendation is that that be
19 left as it is. So, thank you.

20 MR. FISH: Thank you.

21 MS. EDWARDS: Hello. (Native language).
22 Catherine Edward, Tlingit, Raven, Dog salmon.
23 Originally from Angoon. And again, like the others,
24 thank you for allowing me to be here. I am Central
25 Council Tlingit and Haida Sixth Vice President. And

1 I stand today because I have some questions maybe you
2 can help me with, and it might help -- I'm still
3 trying to figure out. There's three applications
4 that we don't know if those -- if those applications
5 are here in this room, or if they were in Fairbanks,
6 or where they were. And I heard you say when we came
7 in, that it would -- it's -- this session is for
8 those people who are in the process of application.
9 Not for the people who already established. So I
10 want to look at the Dear Tribal Letter dated July
11 2nd.

12 It says, in recent years you received a number
13 or requests from groups in the State of Alaska
14 seeking to organize. Well, we've learned that that's
15 three, and that since the process is different from
16 the federal acknowledgment of the American Indian
17 tribes, and then further down it states, so the
18 process is different. You have three applications.
19 And unlike Part 83 process, there are presently no
20 formal rules or regulations to guide not only
21 decision makers on how to implement the Alaska IRA,
22 but also applicant groups on what materials and
23 submissions are necessary to -- or required to make
24 those applications.

25 So you -- I'm trying to understand. You have

1 three applications on your desk somewhere and we
2 don't know if they've turned in the right paperwork
3 or not? That -- that's what I'm trying -- I'm trying
4 to figure out, because it sounds like it says you
5 don't know what submissions are necessary. And then
6 in an effort to provide more clarity and transparency
7 to those groups, we're having these sessions. And
8 then some questions offered to help us guide us in
9 these sessions that I'm still not clear on who came
10 up with these questions. But if I'm looking at them,
11 and I'm a person that might be applying for this, are
12 you asking me to tell you is the provision still
13 relevant for today or not? Are you asking me to tell
14 you how to define and interpret the common bond
15 definition? And then further on down, are those
16 applicants being asked to tell you how to process
17 their applications? Is -- is that what I'm
18 understanding from this Deal Tribal Letter?

19 MR. FISH: And I think in a sense what we're
20 asking is -- is what are your views on what this
21 process should look like. And --

22 MS. EDWARDS: So you're asking us to tell you
23 how to process those applications on your desk, even
24 though we are probably already organized? So, we're
25 supposed to come up with those regulations? Because

1 one of those questions are, should it be policy,
2 should it be regulations, or agency guidance?

3 MR. FISH: So, I think that -- that the
4 consultation isn't premised on those three
5 applications specifically. I think that what we're
6 asking is what, in the broader context of these
7 provisions of the law, should the regulatory process
8 look like in a way that serves the best interest of
9 your communities and your tribal governments.
10 Because whenever you look at it, you're talking about
11 potentially bringing more people into the fold of
12 your peer groups. So I think --

13 MS. EDWARDS: But you said, in an effort to
14 provide more clarity and transparency to the groups
15 seeking to organize. The ones -- the current ones,
16 the three.

17 MR. KELLY: Just to be clear, that it doesn't
18 say that it's only for those three. It says for
19 groups seeking. So there are going to be other
20 groups that made inquires about the process and what
21 would be required of them. It is true that there are
22 three pending applications, as far as I understand.
23 That's not to say there haven't been other inquiries
24 from other folks that might want to do that.

25 MS. EDWARDS: So, we're -- so you want us to

1 answer those questions so you'll be able to process
2 those applications. So, if we wanted to streamline
3 this process, now is the time to do this?

4 MR. FISH: Certainly. Yeah, we would not
5 -- absolutely. That would be very helpful, because
6 that would help us to identify issues that (a) we may
7 have overlooked, but also (b) that might be of
8 concern to you and to other tribes in the Alaska
9 community, that we're not aware of. And that's one
10 way of bringing it to our awareness. So it could be
11 very helpful.

12 MS. EDWARDS: So in answer to your question, is
13 there a need to create separate process for federal
14 acknowledgment of Alaska groups, part -- outside of
15 Part 83. So that would be the people who are
16 applying beside -- and -- and the people who have
17 already established IRAs in this room, that's for us
18 to answer, that should we create a -- we've already
19 heard we don't want the Alaska exception anymore,
20 right?

21 MR. FISH: The Alaska exception?

22 MS. EDWARDS: Yeah. Where -- where we're --
23 where we're left out and we'll do it this way
24 everywhere else, but we'll leave Alaska out and do it
25 different in Alaska. We don't necessarily want

1 things done different for Alaska anymore.

2 I guess I'm still struggling with trying to
3 understand the process, if we're -- if we're going
4 weight those three applications against what we're
5 saying here today.

6 MS. APPEL: I think that remains to be seen,
7 because if we were -- I guess one option is there
8 would be regulations developed for how this common
9 bond provision is carried out and how tribes get
10 recognized that way. And if we had the
11 (indiscernible) on that, there could be a provision -
12 - I mean, it's up for discussion whether the
13 applications that are currently (indiscernible) in
14 the fall under the (indiscernible) regulations,
15 right? Because we wouldn't necessarily want to --

16 MR. FISH: It would have to be mapped out to the
17 point that President Wallace raised earlier in
18 discussing the policies and procedures that were in
19 place around 1936. There is a different statutory
20 reporting for Alaska (indiscernible). No regulations
21 have ever been promulgated or implemented those
22 particular provisions of the statute. So that is one
23 significant legal difference between the IRA's
24 provisions and the existing Part 83 regulations.
25 Which is not to say that Part 83 could not be

1 modified to accommodate that. But it doesn't exist
2 at this time. And so any suggestions or input into
3 how to consider that would be most valuable.

4 MS. APPEL: And I think -- I think it's a
5 question for you all whether, you know, this is
6 something that should be addressed in a regulation,
7 or should it be addressed in guidance, or should the
8 department continue processing these types of
9 requests as it has in the past, without making it any
10 more transparent for logging anymore information for
11 anyone maybe looking to go through the process. So,
12 we want your input as tribes that are already
13 federally recognized and what you think about the
14 course that the department should take with regard to
15 this Alaska IRA (indiscernible). I hope that
16 (indiscernible).

17 MR. NEWMAN: Good morning. My name is Matt
18 Newman. I'm a staff attorney at Native American
19 Rights Fund office in Anchorage. I'm here today
20 working with the Organized Village of Saxman, IRA
21 Council. I just have a couple of general comments,
22 and I apologize to the tribal leaders in the room,
23 because they are legal in nature and are therefore
24 going to be boring.

25 But one thing I want to begin with, and to echo

1 what President Wallace mentioned earlier, is how
2 difficult actually providing testimony on this issue
3 is, because there is a great amount of uncertainty
4 that -- as to number 1, who in Alaska this
5 conversation is affected. As we've kind of
6 reiterated a few times in testimony today, none of
7 us, including the representatives from the
8 department, can really name or identify even who the
9 existing groups seeking recognition are, where
10 they're located, and what are the problems or the
11 causes of delay in their application process. And
12 so, I would just reiterate, as many speakers have
13 shared today, that we have the cart before the horse.
14 That the first thing that should be happening, prior
15 to these consultations dragging tribal leaders away
16 from subsistence activities, is we -- there should
17 have been formal meetings with the actual groups
18 themselves. They are the ones having problems. They
19 are the ones suffering from delay. So they are the
20 ones who should be consulted on an issue pertaining
21 to them. Because as Mr. Fish very clearly,
22 unequivocally told us earlier this morning, this
23 regulatory decision, if there ever is one, or at
24 least this consultation today, is not pertaining to
25 the recognition of the 229 presently recognized

1 tribes. So, rather than starting with the 229, we
2 should be starting with the two or three that are
3 being harmed by delays in the process.

4 And that actually brings me to another point I
5 want to raise. Earlier in the introductions, staff
6 mentioned that -- that, you know, one of the problems
7 here is that there is no guidance for processing
8 these petitions. And I have to exception with that,
9 because there is guidance. And in fact, one of the
10 documents I have in here in front of me is
11 instructions for organizing in Alaska under the
12 Reorganization Act. And it's a document signed by
13 Harold Ices, Secretary of the Interior in 1937 as to
14 how Alaska Natives sharing a common bond and
15 occupation with one another may organize as a
16 federally recognized tribe under the Alaska IRA. And
17 this guidance has been used repeatedly throughout the
18 20th century and even into the 21st century to
19 organize groups, bands, villages of Alaska Natives
20 into IRA councils. And in fact, it was most recently
21 used in 2001 when the Birch Creek tribe in the Yukon
22 Flats region of Alaska received its IRA constitution.

23 So, I don't think it's appropriate for the
24 department to represent to the tribal leaders that
25 this is a blank slate, that there is no anything here

1 by which to mark the trail. You have guidelines, old
2 as they are, 1937, and you have precedent of
3 recognizing 80, near 80 IRA tribes within the State
4 of Alaska.

5 Now, I appreciate and can agree that perhaps if
6 the guidelines are as old as 1937, then having a
7 fresh look or having a conversation about updating
8 them, may indeed be necessary. But, a conversation
9 like that is one, I think, that needs to be
10 approached in a much more sincere way. And what I
11 mean by that is, starting a conversation with people
12 who are affected.

13 So in addition to the three councils, or three
14 groups that are seeking recognition, contacting the
15 Birch Creek tribe that completed this process in
16 2001. The village of Eagle that received recognition
17 in 1998. Dot Lake village in 1994. There is a --
18 there is knowledge and experience to be gained by
19 those tribes that have in recent memory completed
20 this process. That's where to start. Not with the
21 contacting or consulting the 229 tribes. And -- and
22 again, I'm not anti consultation here, but you've
23 -- you've asked tribal leaders to come to this room,
24 and we can't even name the people we're talking about
25 in this consultation. That's not right. That's not

1 how consultation should be done. It should be
2 informed dialog between sovereigns, not a pop quiz on
3 who are we talking about, where are they, what are we
4 doing.

5 And finally, I would just like to highlight a
6 letter from the Alaska Federation of Natives signed
7 by President Julie Kitka that was submitted to
8 Secretary Zinke on January 19th, 2018. And the
9 reason I want to highlight this letter is that in it,
10 President Kitka provides a very detailed summary of
11 the experiences that at least two of the petitioning
12 communities have had in their federal acknowledgment
13 process under the Alaska IRA. And the reason I bring
14 it up is this letter and the history that it outlines
15 is not one that illustrates the difficulties or the
16 damage that the Ices' guidelines or the BIA policies
17 have. Instead, it actually is describing the history
18 here of what happens when tribal recognition
19 decisions are politicized. And both of these
20 petitioners, including the community in Seward that
21 has been waiting 23 years to have its petition
22 processed, they have been treated like a ping pong
23 ball between administrations, because political
24 appointees have not been dealing with the issue
25 according to the guidelines, according to the

1 precedent that was established. So, I would
2 encourage, as part of your record, as part of your
3 conversations internally at the department, to get a
4 copy of this letter. I know my office would be happy
5 to provide it, as well as AFN.

6 And really, in closing, I guess I would just
7 emphasize again that the real issue here, or the real
8 stakeholders in this process, are the ones who need
9 to be consulted. And it's those tribal -- or those
10 communities that are seeking tribal recognition who
11 are not in the room today. They were not in the room
12 in Juneau and they were not in the room in Fairbanks.
13 There are in Dillingham, Alaska, they are in Seward,
14 Alaska, and then as for a third one that's mentioned,
15 I -- this was the first I heard there's a third one,
16 but I can at least say that two are known to me.
17 They need to be included in a future consultation.
18 They're the ones who need to be spoken to about this
19 issue. Thank you and good morning.

20 MR. FISH: Thank you.

21 MR. BAKER-SHANK: Good morning. Good afternoon
22 to east coasters. My name is Philip Baker-Shank.
23 I'm with Holland and Knight. We're a law firm that
24 represents two of the tribes represented in this
25 room. And I appreciate the courtesy. Those tribes

1 are Central Council Tlingit and Haida and Ketchikan
2 Indian Community. But I don't want to speak in front
3 of any tribal leaders, so if there's nobody behind
4 me, I will -- I will raise a question for the panel.

5 There is in this consultation letter and
6 implicit question. And that is, what part of Part 83
7 is not sufficient. To answer your question,
8 generally. You referenced and handed out the IRA
9 section at issue, 51.19. But your letter refers only
10 to common bond of occupation. If you read that
11 statute, it of course says, common bond of occupation
12 -- I'll quote it, having a common bond of occupation,
13 comma, or association, comma, or residence within a
14 well-defined neighborhood, community or rural
15 district.

16 Now, your letter focuses only on one piece of a
17 disjunctive in the statute. You've got to follow the
18 statute. Any regs you write, any consultation you're
19 dealing with ought to be looking at the statutory
20 framework, not just one piece. It's a three-legged
21 stool. It's disjunctive. One, two or three of those
22 can fit. Now this is elementary statutory
23 construction.

24 MR. FISH: So question 3 doesn't address that?

25 MR. BAKER-SHANK: Question 3 only addresses the

1 residency. So what about association? What does
2 association mean in the context of the IRA? It's
3 very plain. It means political, cultural, ethnicity,
4 language, peoplehood. So the IRA was an incredibly
5 diverse act. Trying to do an organizational
6 framework, which your questions are veering way off
7 into one side. And your answers can be found in the
8 statute and in the way this -- this -- the
9 department, your predecessors have looked at the
10 statute. The courts have long interpreted this
11 statute. I'm -- I am mystified by the questions.
12 For all the reasons that were just said, plus this
13 one.

14 And so, beyond that point, I want to say that
15 the Part 83, very controversial, changed over time by
16 your predecessors at the department, has been working
17 Counsel from NARF just listed several procedure --
18 several outcomes of that here in Alaska. We can go
19 through a list of those that have -- Part 83 has been
20 applied to in the Lower-48.

21 So, I guess the question I want to leave you
22 with, and you care to answer now or mull it over or
23 reject it as invalid, is what part of Part 83 does
24 not answer all of these questions? You have a
25 procedure for dealing with groups who say we are

1 Indian and we want to be recognized as that, here in
2 this way and fashion. And Part 83, the federal
3 acknowledgment procedures regulations, attempt to
4 address these questions. And here again, the 1994
5 amendments of the congress of the United States
6 specifically instructed the department, you may not
7 write in special exceptions for Alaska or any
8 particular tribe. No two classes of tribes. Groups
9 seeking recognition in Alaska are no different than
10 groups seeking recognition in Massachusetts. Or in
11 California. So that would be the question I would
12 have for you and the panel and -- and those to whom
13 you report. Thank you for listening.

14 MR. FISH: Do we have anyone else who'd like to
15 provide some comments? We could break a little bit
16 early and then meet back at 1:00. I want to thank
17 everyone for providing statements that you've
18 provided this morning. I know this is a relatively
19 small group, but you've provided some really
20 thoughtful input that will spark a lot of discussion
21 and consideration. So thank you. See you back at
22 1:00.

23 (Off record)

24

25