



Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska

June 21, 2018

United States Department of the Interior
Office of the Secretary
Washington, DC 20240

Re: Potential revisions to trust acquisition regulations

Sitka Tribe of Alaska submits the following comments on the proposed revisions to the trust acquisition regulations at 25 CFR § 151.11 & § 151.12.

Sitka Tribe of Alaska is a federally-recognized Indian tribe in Sitka, Alaska, representing over 4000 citizens. The federal government has a unique trust relationship with Native Americans and Alaska Natives, and has formally acknowledged this trust relationship with federal recognition of tribes. One component of that trust relationship has been the federal protection of the trust status for land, which allows tribes organized under the Indian Reorganization Act to place land into trust and continue to exercise their inherent sovereignty without interference from state and local governments. The Department of the Interior should work to further the purposes of the Indian Reorganization Act by facilitating the ability of tribes to place their land into trust, rather than imposing burdensome bureaucratic requirements.

The revisions propose to reintroduce a 30-day waiting period after Secretarial approval before lands can be finally taken into trust. This is an additional, unnecessary delay. The approval process is currently operating without that waiting period, and a court may order land to be taken out of trust if appropriate.

The proposed regulations will also impose a two-stage review and approval process, introduce a lengthy list of application items that must be included, and distinguish acquisitions for gaming. These requirements put too much of the burden on tribes to justify an application for land to be put in trust. A two-stage review means that tribes must submit two sets of documentation, and will experience longer wait times for decisions. Adding a separate process for gaming also introduces unnecessary and duplicative requirements. There are already additional requirements at 25 CFR § 292 that apply to gaming trust acquisitions in addition to these regulations; there is little justification for adding these additional burdens to tribal applications.

Sitka Tribe of Alaska encourages the Department of the Interior to work to reduce, not increase, the burden on tribes attempting to place land into trust.

Sincerely,



KathyHope Erickson
Tribal Chairman