"Steve Sumida"
<deputy@alaskaintertribal.org>

12/19/2005 08:10 PM

To
<vegeis@nv.blm.gov>

cc
"AITC" <aitc@alaskaintertribal.org>, "Ian Erlich" <ierlich@maniilaq.org>, "Mike Williams" <mwilliams19522004@yahoo.com>, "David Kaiser" <David.Kaiser@noaa.gov>

Subject
Vegetation Treatment on Alaska subsistence lands

BY EMAIL

Mr. Brian Amme
PEIS Project Manager
Nevada State Office
1340 Financial Boulevard
P.O. Box 12000
Reno, Nevada 89520-0006
Fax: (775) 861-6712
Electronic Mail: vegeis@nv.blm.gov

RE: 'Draft Programmatic Environmental Impact Statement and Environmental Report for Vegetation Treatments on Public Lands Administered by the Bureau of Land Management in the Western United States, Including Alaska'.

1 The Alaska Inter-Tribal Council is a consortia of federally recognized Tribes that advocates on behalf of issues of concern to the Traditional and IRA tribal governments across Alaska.

2 AITC recently learned that the Bureau of Land Management, is requesting comments by January 9, 2006 on herbicide use on the vegetation relied upon for subsistence by the indigenous people of Alaska. We further understand

2 that no public hearings have been held nor are scheduled to be held in Alaska on this matter. This matter is far too important not to include Alaska's tribal governments in the public process.

3 AITC strongly urges the rescission of this deadline until after the BLM and its cooperating agencies, including the US Fish and Wildlife Service and the US Department of Defense conform to the requirements of Executive Orders 12898 on Environmental Justice and E.O. 13175 on government to government relations with federally recognized Tribal governments.

4 Tribal members all across Alaska depend directly on subsistence gathering and hunting on federal lands. This right is protected by international law and the provisions of ANILCA as well as the above executive orders. Contamination of food sources of the indigenous people is a serious matter for the tribal governments that should be recognized directly by the federal government through one on one meetings in the communities adjacent to the impacted federal lands. Publication in the federal register of actions directly related to protected indigenous subsistence activities is wholly inadequate for Tribes with little access to the internet or awareness of meetings and decisions held thousands of miles from the impacted traditional lands.

5 The Alaska Inter-Tribal Council respectfully requests that all tribes in the region, as sovereigns concerned about herbicide activities on traditional lands, must be directly notified and provided government to government consultation on such action before the public notice process. The Alaska Inter-Tribal Council requests that the Executive Orders on Environmental Justice and government to government relations be acknowledged and implemented and that the public comment and review process cease until such time as the Tribal governments have been afforded meaningful participation.

Steven E. Sumida, Acting Executive Director
Alaska Inter-Tribal Council
1569 S. Bragaw, Ste 102
Anchorage, Alaska 99508
Phone: (907) 563-9334
Fax: (907) 563-9337
aitc@alaskaintertribal.org