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Elizabeth Appel (RE: 1076-AF18)
Office of Regulatory Affairs and Collaborative Action
U.S. Department of the Interior
1849 C Street, N.W., MS- 4141-MIB
Washington, D.C. 20240

Dear Ms. Appel:

I write today to show my strong support for the Revisions to Regulations on Federal Acknowledgment of Indian Tribes 25 CFR 83 from the U.S. Department of the Interior, Office of the Assistant Secretary - Indian Affairs. As a professional anthropologist and concerned citizen, I have been watching the Federal Acknowledgment process for almost 15 years and have been disappointed in the nature and outcomes of it over the last ten years for some of our nation's Indigenous people. It is time to streamline the federal recognition process so that petitioners can be treated fairly and with due diligence.

The new draft rule accomplishes many of these aspects, which is why I advocate for it. For example, it makes the process more efficient so that Native American petitioners do not expend more resources than they have and wait inordinate amounts of time, more transparent so that all parties can better understand how it works and what to expect, and more flexible to account for the complex and sometimes quite unique histories of Native American communities around the country. In addition, the draft rule strengthens the integrity of the process as well to ensure that decisions are accurate and upheld rather than subject to unnecessary political maneuvering and extended appeals to revoke them. The strongest components of the new regulations pertain to (1) the elimination of the Interior Board of Indian Appeals review (as an unnecessary administrative step in what is already a long process with significant input), (2) the clarification of the criteria about the frequency and timing of political leadership and community, and (3) the initiation of an expedited process that not only allows a rapid negative determination if key criteria are not met but also permits an expedited favorable review for those who meet the very reasonable and clear new criteria of having State recognition or U.S. land held for them after the 1934 threshold. I support all of these and applaud the drafters for their foresight.

Our nation's first people deserve the position that Federal Acknowledgment brings once they have documented themselves as one of those long-standing communities. This position brings assistance with housing, education, and healthcare to tribal groups who often desperately need it, and getting there has required a tremendous investment of resources (often borrowed just to conduct the research and prepare the petition). To have it subject to political vagaries, non-transparent decisions, unfair delays, variable federal administrations, and non-accountability is another injustice that Native American people do not need. On top of that, being granted the deserved recognition after meeting all seven rigorous criteria and then having it stripped by an Interior Board of Indian Appeals decision adds insult to injury. For example, the Eastern Pequot Tribal Nation in Connecticut experienced this tragedy, making them the only Native American community in the Bureau of Indian Affairs' history to have its federal recognition rescinded, despite receiving a strong positive decision and having maintained an official relationship with the State of Connecticut since Connecticut was a state. This

kind of outcome for one of the oldest reservations in the entire United States has tainted perceptions of the Federal Acknowledgment process among anthropologists, other Native Americans, and many concerned citizens.

I am relieved to see that this new draft rule rectifies some of these problems, and I hope you will implement it with some of the helpful proposed word changes already submitted by others. Many of the new draft aspects will repair the process and assist those in the present and the future who are going through it.

Thank you for reading these comments and registering my support.

Sincerely,

A handwritten signature in cursive script that reads "Stephen Silliman". The signature is written in black ink and is positioned below the word "Sincerely,".

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