

# SANTA ROSA RANCHERIA TACHI YOKUT TRIBE

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Vice Chairman

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Secretary

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Delegates

May 19, 2021

Department of Interior  
Office of the Assistant Secretary – Indian Affairs  
Attn: Office of Federal Acknowledgment  
1849 C Street NW, MS-4071 MIB  
Washington, DC 20240

Dear Acting Assistant Secretary:

On behalf of the Tachi Yokut Tribe, known as the Santa Rosa Indian Community of the Santa Rosa Rancheria, California (“Tachi”), a federally recognized Indian tribe, 86 Fed. Reg. 7554, 7557 (Jan. 29, 2021), I am writing in support of the Southern Sierra Miwuk Nation’s (“Tribe”) petition for federal acknowledgment.

The Proposed Finding issued against recognition is flawed in that it only evaluated one portion of one of the seven mandatory criteria, 83.7(b) which requires “[a] predominant portion of the petitioning group comprises a distinct community and has existed as a community<sup>1</sup> from historical times until the present” (hereinafter referred to as the “community criterion”). In assessing the community criterion, the AS-IA evaluated only the Tribe’s modern period of community from 1982-2011 to ultimately find it lacking. A thorough evaluation of the rest of the community criterion and the other six criteria would have afforded Assistant Secretary of Indian Affairs with information and background to enhance its evaluation of the modern community criterion. Without a full understanding of the Tribe’s historical community, politics, culture and descent therefrom, the AS-IA cannot adequately understand the Tribe’s modern community; there is no doubt each and every tribes’ current existence is critically connected to its tribal history. Tribal community history is the foundation of each tribe’s current make-up, which is why it is required to be taken into consideration by the Department of Interior.

It is important to Tachi and all Native American communities that the Department of Interior not bypass a thorough examination of the historical evidence of community before rejecting an application for acknowledgement based on lack of modern community evidence. Tachi believes

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<sup>1</sup> The 1994 Regulations define “community” to mean “any group of people which can demonstrate that consistent interactions and significant social relationships exist within its membership and that its members are differentiated from and identified as distinct from nonmembers. *Community* must be understood in the context of the history, geography, culture and social organization of the group.”

the Department of Interior should review not only any newly submitted evidence but also all prior historical evidence submitted by the Tribe prior to the Proposed Finding being issued. Tachi supports a uniform recognition process in which all tribes are held to the same standard and requests the Proposed Finding, and the remaining six criteria, be thoroughly reviewed and analyzed before issuance of a Final Determination.

Thank you for your time and consideration of this matter and please reach out if you should wish to further discuss.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Robert Jeff II', written in a cursive style.

Robert Jeff II  
Vice Chairman