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Department of the Interior
Alaska Consultation Policy
Office of the Secretary
1849 C Street NW., Washington, DC 20240

Transmitted via email to: consultation@doi.com

RE: Draft Policy on Consultation with Alaska Native Claims Settlement Act Corporations

Thank you for providing Doyon, Limited (Doyon) the opportunity to submit the following comments in response to the Draft Policy on Consultation with Alaska Native Claims Settlement Act Corporations Notice of availability and request for comments 77 Fed. Reg. 13137 (March 5, 2012).

Doyon is one of the thirteen Native regional corporations established by Congress under the terms of the Alaska Native Claims Settlement Act (ANCSA) Pub. L. No. 92-203, 85 Stat. 688 (1971), as amended. Doyon is the largest private landowner in Alaska, with a land entitlement under ANCSA of more than 12.5 million acres.

Doyon's mission is to promote the economic and social well-being of our present and future shareholders, to strengthen the Native way of life of our Alaska Native shareholders, and to protect and enhance our land and resources. Voting shares of stock originally were issued to 9,061 Alaska Natives who are the indigenous people of the region and whose ancestors have inhabited the region for thousands of years. In March 1992, shareholders approved giving stock to Native children born between 1971 and 1992, missed enrollees and Elders who were age 65 by December 1992. Today, Doyon has more than 18,500 shareholders.

Doyon appreciates that the Department of Interior has made provisions for conducting consultation in compliance with Executive Order (E.O) 13175. The Draft Policy on Consultation with ANCSA Corporation appropriately acknowledges the differences between ANCSA Corporations and tribes, and at the same time recognizes consultation with ANCSA Corporations is necessary. Because ANCSA Corporations are the primary landowners of traditional lands in Alaska, it is critical that the Federal government consult with ANCSA Corporations in those instances where departmental actions may have a direct impact on ANCSA lands.

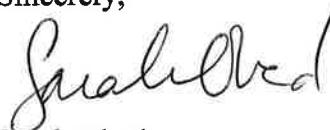
Tribal Consultation is a process that aims to create effective collaboration with Indian tribes and to inform Federal decision makers to exchange of information and promotes

enhanced communication. **Section VI. Innovative and Effective Consultation Practices** provides for participation in a joint Tribal-Federal team, and Doyon, Limited seeks clarification on how representatives from ANCSA corporations will participate in this process.

Doyon believes that the draft policy for Consultation with ANCSA Corporations, like the Policy for Tribal Consultation, has been drafted allowing for flexibility, and it is our hope that flexibility and communication remain a priority during the policy's implementation. Flexibility is important to ensure that consultation is effective and not a costly and time consuming process which would can be misused by federal agencies to hinder the ability to pursue economic and resource development projects on ANCSA lands when located near federal lands.

In closing, Doyon, Limited urges the Department of Interior and the Administration to establish these joint policies (Department of Interior Policy on Consultation with Indian Tribes and the DRAFT Department of the Interior Policy on Consultation with Alaska Native Claims Settlement ACT (ANCSA) Corporations) as a framework for government wide consultation policies. We thank you for your consideration of these comments.

Sincerely,



Sarah Obed
Director of Government Relations