



April 27, 2012

The Honorable Ken Salazar
The Secretary of the Interior
US Department of the Interior
Office of the Secretary
Washington, D.C. 20240

RE: Comments of Cook Inlet Region, Inc. regarding Department's of Interior's Draft Policy on Consultation with Alaska Native Claims Settlement Act (ANCSA) Corporations

Dear Secretary Salazar:

On behalf of Cook Inlet Region, Inc. (CIRI), we appreciate the chance to submit comments and recommendations on the Department of the Interior's Draft ***Consultation Policy on with Alaska Native Claims Settlement Act (ANCSA) Corporations***. CIRI is an Alaska Native regional corporation that was created by the Alaska Native Claims Settlement Act of 1971 (ANCSA). The Mission of CIRI is to promote the economic and social well-being and Alaska Native heritage of our shareholders, now and into the future, through prudent stewardship of the company's resources, while furthering self-sufficiency among shareholders and their families.

CIRI urges the Department to adopt a single consultation policy for the ANCSA Corporations and the federally recognized tribes located within the State of Alaska. The utilization of the bifurcated approach created by the Department might lead to unfair or unequal treatment by the Government in properly evaluating the effects of governmental action on both tribes and ANCSA corporations. With regard to the proposed draft consultation policy with ANCSA corporations, we offer the following comments and recommendations:

Section III. Definitions

The definitions provided in the policy for consultation with ANCSA corporations incorporates those provided in the Tribal consultation policy; therefore, we respectfully request that the definition of "Indian Tribe" be explicitly expanded to include Alaska Native Corporations. Since the passage of the Alaska Native Claims Settlement Act (ANCSA), Congress has seen fit to define Alaska Native Corporations (ANC's) as "Indian tribes" and ANCSA lands as "Indian lands." CIRI requests that the definition be expanded to explicitly include Alaska Native Corporations.

In implementing the final policy from the Department, the method of giving "Notice of Consultation" to the interested parties will be particularly crucial. Since the Department's final tribal consultation policy does not include consultation with Alaska Native regional non-profit organizations directly, notice should be also provided to these groups to insure that both Alaska Tribes and ANCSA Corporations are adequately given notice and opportunity to be heard. In the CIRI region, our non-profit organizations are significant organizations within the Alaska Native institutional framework. They provide services and institutional support to villages within our region. Providing Notice to the non-profit Alaska Native regional organizations will prove valuable to the Department in insuring that adequate notice is given to effected groups.

CIRI is proud to have supported and hosted the Anchorage, Alaska public hearing on the Department's Draft consultation policy. We feel fortunate to have been able to participate in the drafting process for this policy. We generally agree and support the Department of the Interior's Draft Consultation Policy on with Alaska Native Claims Settlement Act (ANCSA) Corporations. Thank you for your consideration of these comments. If you have any questions regarding the comment and recommendations please call me at CIRI at (907) 263-5149.

Sincerely,



Gregory Razo
Vice President