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April 30, 2007

Forrest Cole, Forest Supervisor
Tongass National Forest
USDA Forest Service
648 Mission Street,
Ketchikan AK 99901

Re: Sealaska Corporation Comments: January 2007 Draft Environmental Impact Statement, Tongass Land and Resource Management Plan Amendment

Dear Mr. Cole:

Sealaska Corporation ("Sealaska") submits the following comments on the January 2007 Draft Environmental Impact Statement ("EIS") for considering further amendment of the current revised Tongass National Forest Land and Resource Management Plan ("TLMP", "LRMP", or "Forest Plan"). Sealaska supports the comments and recommendations of the Alaska Forest Association, the Alaska Miners Association and the Southeast Conference to the extent that the Tongass National Forest must provide a supply of timber that will fully support the existing industry operating on a two shift basis. Sealaska believes that supply of less than that capacity will doom the industry to stagnation, leading to no new investments or growth. In addition Sealaska fully recognizes the need to expand the industry to allow for additional growth to become better integrated, again ensuring that this industry has the chance to expand as a predictable supply becomes available from mature and emerging second growth forests.

Sealaska is a member of the Tongass Futures Roundtable and supports the efforts of the Roundtable to establish a sustainable timber industry in the region. Sealaska supports possible modifications to national forest regulations and Tongass National Forest Plan that will allow:

- Modified standards and guides to make more mature timber available.
- Acceleration in the harvest of second growth timber that may require amendment to national policy and TLMP requirements that restricts harvest until the culmination of mean annual increment has been met.
- Other standards and practices to ensure that short-term supply is available and that additional future supply will be made available to allow the expansion of the industry.

In addition, Sealaska will provide more extended comments relating to the completion of the ANCSA land entitlements, below.

I. INTRODUCTION

Sealaska is the Regional Corporation for Southeast Alaska established under the Alaska Native Claims Settlement Act ("ANCSA"), as part of implementing a fair and just settlement of Alaska Native land claims in conformity with the real economic and social needs of Alaska Natives. Sealaska represents over 17,000 Native shareholders, including 10,000 families living in Southeast and throughout Alaska. Sealaska is entitled under ANCSA to select and receive title to acreage to meet the cultural and socioeconomic needs of its Alaska Native shareholders. This entitlement will exceed 370,000 total acres in Southeast Alaska.

Sealaska is the largest private landowner in Southeast Alaska, currently owning and managing more than 290,000 acres of land adjacent to the Tongass National Forest and other ownerships. Sealaska shares over 300 miles of common property boundary with the national forest. Sealaska is a leader in the forest product and broader economy of Alaska. Sealaska and its contractors, collectively, comprise the single largest private employer in Southeast Alaska, providing an average of 700 jobs with an annual payroll of \$30 million. Total Sealaska spending tops \$50 million each year. As verified by independent market research studies, Sealaska corporate and contractor operations and expenditures sustain the broader forest industry and service infrastructure in the region.

Sealaska timber harvest and other operations, through revenue distributions to Sealaska shareholders and the revenue sharing provisions of ANCSA, benefit over 80,000 Alaska Native shareholders and the economy in all regions of the State. Sealaska has distributed approximately \$40 million directly to its shareholders during the past five years, a significant portion of all Sealaska shareholder distributions originate from the harvest of timber from Sealaska lands. Sealaska revenue sharing with other regions totals over \$300 million to date—over 40 percent of all the revenue shared under ANCSA.

Sealaska is also a cultural and civic leader in Alaska. Sealaska timber and other operations provide funding for the Sealaska Heritage Institute (SHI). Through SHI, Sealaska actively supports and furthers Alaska Native heritage research, education, scholarships, and other programs that enhance communities throughout Southeast Alaska for residents and visitors alike.

Sealaska is a leader in land stewardship and has invested over \$10 million in planting, thinning, pruning and other young forest care to assure forests that sustain harvest, wildlife habitat and other uses into the future. It has also maintained buffer zones on its lands encompassing 150 million board feet of merchantable trees to protect fish and wildlife habitats, animal migration routes, municipal watersheds and viewsheds. Sealaska, in partnership with universities and federal and state agencies, is engaged in ongoing scientific research to evaluate and improve forest practices to benefit fish and wildlife and other resources. As a result, over 30 reports, studies and articles have been published; of which several have been peer reviewed and published in scientific journals.

In ANCSA, Congress directed federal agencies to complete conveyance of lands to Native Corporations rapidly, to provide a sustainable economic and cultural future for Alaska Natives as an entitlement in settlement of their land claims. Despite this promise, over thirty-five years after enactment of ANCSA has passed and Sealaska has yet to receive its full entitlement of lands in Southeast Alaska. During this lengthy time

period, the Bureau of Land Management and Forest Service have at repeated intervals grossly underestimated the acreage of Sealaska's entitlement, and imposed further bureaucratic and political intrusions and encumbrances on Sealaska's ability to select and receive conveyances of ANCSA lands that have hindered the social, cultural and economic wellbeing of its shareholders. These restrictions, together with arbitrary limits in the areas withdrawn for selection and geographical circumstances, have rendered it impossible for Sealaska to complete its entitlement as intended by ANCSA within the existing withdrawal areas in a viable, sustainable configuration.

The conveyance to Sealaska of its remaining entitlement in a sustainable configuration will enable Sealaska to continue to supply benefits to its many shareholders, to provide meaningful jobs, maintain the Southeast Alaska forest industry, make payments to other Alaska regions, and ultimately fulfill the purpose and promise of ANCSA, for the enduring benefit of all Alaskans. Timely completion of a sustainable Sealaska entitlement is needed to perpetuate the infrastructure and bring certainty to land status required for Tongass National Forest management into the future. Thus, completing ANCSA conveyances to Sealaska in a sustainable configuration is a high priority for Sealaska, and should be for the Forest Service. The Forest Service has recognized this outstanding issue in Appendix C of the plan revision. However, Sealaska believes that the treatment of the Congressionally mandated requirements have been not given the emphasis and priority that they deserve. We need to remind the Forest Service that we appreciate the collaborative relationship that exists between both parties, but the agreement between Alaska Natives and the Congress of the United States obligates the Forest Service to take every action required to ensure that those agreements are fulfilled.

To assist the Forest Service in helping the Nation meet its obligations to Alaska Natives, Sealaska currently has identified nine Tongass parcels totaling a pool of 95,000 acres, from which to select and receive conveyances to fulfill the remaining entitlement. Sealaska currently owns and manages 88 Alaska Native sacred (historic) sites and there are over 245 additional confirmed sites, averaging 8 to 10 acres per site, to which Sealaska may receive title under ANCSA. There are approximately 327,000 acres of Tongass National forest land withdrawn for Alaska Native Selection within the existing ANCSA withdrawals that Sealaska's right to select and request conveyance interfere with public investment and active management. Fulfillment of Sealaska's ANCSA land entitlement will terminate its rights to these withdrawn lands and will allow Tongass National Forest investment and active management of all of these lands for the full benefit of the public.

Our comments on the Draft EIS therefore are focused upon assuring that the Final EIS and TLMP Amendment decision: 1) reflect the need to complete resolution and conveyance of Sealaska's land entitlement in a sustainable configuration, as soon as practicable; 2) accurately depict the land and resource management and Southeast Alaska socioeconomic benefits and other effects of fulfilling that obligation in relation to the lands that Sealaska has identified to consider for conveyance and release; and 3) do not compromise our ability to fulfill that entitlement. We are not attempting in these comments to address the more general merits of the various alternatives or their projected environmental effects in the Draft EIS. We generally concur with the comments of the Alaska Forest Association and Southeast Conference regarding these more general considerations. We also incorporate our prior comments submitted to the Forest Service during the TLMP Revision process, to the extent those have not yet been adequately addressed. The comments in this letter should not otherwise be considered exhaustive.

II. SUMMARY

The Draft EIS, particularly in Appendix C but reflected in several other sections, presents an erroneous and unreliable description of Sealaska's ANCSA land entitlement and the effects of foreseeable adjustments to complete the entitlement in a configuration that provides a sustainable economic and cultural future. The Draft EIS treats Sealaska's land entitlement and adjustment proposal as a negative encumbrance that the Forest Service will address grudgingly, if at all. Sealaska believes that the Forest Service is an agent of the Congress and the President of the United States and has an obligation to complete the contracts that were agreed to between Alaska Natives and the governing bodies of the Nation. The Forest Service must treat the completion of ANCSA and their role as part of fulfilling the National Policy and which is not secondary to Forest Service or other missions. To that extent Sealaska supports inclusion of the ANCSA entitlements in Appendix C but is concerned how the unfilled ANCSA entitlements were addressed in the appendix, including failure to describe that ANCSA is a law of the land and is on equal par with other laws and failing to provide a unbiased summary of the importance of completing these entitlements and the impact on the overall management of the forest.

Appendix C to the Draft EIS mischaracterizes and exaggerates potential negative effects of completing the entitlement as proposed by Sealaska, and largely ignores benefits. Fulfilling the entitlement as proposed will yield overall net benefits for the Southeast Alaska economy and environment, and the potential adverse effects are not significant. The Draft EIS also overestimates the potential negative cumulative effects of timber harvest and other activities on Sealaska and other nonfederal lands in Southeast Alaska, although the EIS correctly reflects that these effects are not significant.

The above errors in the Draft EIS do not appear critical to a decision regarding further amendment of Forest Plan to address the litigated roadless area issues that are the focus of the current amendment and EIS process. Nonetheless, the erroneous analysis and presentation regarding Sealaska's entitlement and related effects must be corrected in the Final EIS to avoid misleading the public, as Sealaska and the Forest Service move forward to fulfill the entitlement.

III. COMMENTS

APPENDIX C. Potential Land Adjustments (located in Proposed LRMP volume)

Most of our comments focus upon Appendix C, as it is the section that most directly addresses completion of Sealaska's entitlement and related effects, and the analysis and conclusions in Appendix C are reflected in various sections of the Draft EIS volume and accompanying proposed LRMP.

Appendix C does not present an accurate or objective picture of Sealaska's ANCSA land entitlement, or the effects of land selection and conveyance adjustments to fulfill the entitlement in a configuration that meets the intent and purposes of ANCSA. The estimated adverse effects on timber supply and other resources and uses depicted in Appendix C from completing Sealaska's entitlement are grossly overstated and unreliable. The defects in Appendix C include the following:

1. The Appendix underestimates the acreage of Sealaska's remaining entitlement. App. C at C-6. Under Section 14(h)(8) and other ANCSA provisions, Sealaska's current estimated remaining entitlement acreage is at least 65,000 to 85,000 acres and may be greater as Section 14(h)(1)-(7) conveyances are completed and 14(h)(8) allocations are updated, as well as being subject to upward adjustment in remedial legislation. Section 205 of the Alaska Land Transfer Acceleration Act ("ALTAA"), enacted in late 2004, amended Section 14(h)(8) of ANCSA to increase the minimum additional acreage allocated to Sealaska for expedited conveyance, but did not establish any maximum.
2. The Appendix grossly underestimates the advantages to the public of releasing most or all of the 327,000 acres of lands remaining withdrawn for Sealaska selections and conveyances that completion of Sealaska's entitlement will accomplish. This large acreage of land remains encumbered and restricted from commercial timber production, recreation and other infrastructure development, and other public investment and active management while it remains withdrawn. This restriction extends to all of the withdrawn lands, not just to 171,000 acres of lands that the Appendix characterizes as "selected." App. C. at C-7. See TLMP, Standards and Guidelines, Lands, Page 4-28/29. The Appendix thus does not accurately present the reduction in available Tongass land base and allowable timber harvest encompassed by the withdrawn lands.
3. The Appendix grossly overestimates the net effect on Tongass timber harvest from conveyance to Sealaska of its complete entitlement through exchange and other adjustments. The Appendix depicts potential selection and conveyance of 115,000 acres for "Unrecognized Southeast Alaska Communities" as reducing the total Forest land base by 0.7 percent and having a minor reduction on suitable timber and ASQ. App. C. at C-3. The Appendix then projects that potential entitlement and exchange conveyances to Sealaska in the same range of acres would reduce the ASQ by 12 percent, and could have an attendant significant adverse effect on the supply of timber to Southeast Alaska mills. App. C at C-7. These conclusions appear to be based at least in part on errors in 1) grossly overestimating the total amount of acreage and timber base that would be conveyed to Sealaska (197,000 total acres rather than 95,000 acres or less; Table C-2, App. C at C-10); 2) ignoring or underestimating the countervailing gain in available land and timber from exchange lands transferred to the Tongass, and also 3) ignoring or underestimating the additional gain in available land and timber from release of most or all of the 327,000 acres of withdrawn lands upon fulfillment of Sealaska's entitlement. The net effect could easily be a gain in national forest timber and other resources available for public use. The comparison between the 95,000 acres versus the 327,000 acres in Productive Old Growth (POG), Old Growth Reserves (OGR), and suitable for timber harvest is:

CATEGORY	Out-of- Withdrawal 95,000 Entitlement Pool (Acres)	327,000 Lands Withdrawn for Native Selection (Acres)
High Volume / Ac POG	40,839	38,840
Medium Volume / Ac POG	13,911	72,951
Total Productive Old Growth (POG)¹	54,750	111,791
Small Old Growth Reserves	7,633	7,332
Medium Old Growth Reserves	1,147	52,272
Large Old Growth Reserves	6,056	1,328
Total Old Growth Reserves²	14,863	60,932
Estimate Suitable Acres ³	40,064	38,744
Acres Not Suitable ⁴	54,936	288,256
Total	95,000	327,000

4. The conclusions about timber effects also ignore that timber in any transfer of lands from the Tongass to Sealaska ownership remains available to support the Southeast Alaska forest industry, and that Sealaska's ability to continue to provide timber harvest from its lands is essential to that industry's infrastructure and survival. Even assuming a 12% reduction in Tongass timber land base or ASQ, the effect on actual delivery of Tongass logs to Southeast Alaska mills will be negligible—the Forest Service consistently has only delivered a fraction of the available ASQ in timber sales throughout the past decade. See Draft EIS, Pages 3-249 to 3-251, 3-422. Further, when logging, longshoring, sortyard, and other local jobs directly involved in delivering logs for the export market from Sealaska and other lands are considered, these operations provide as many or more family-wage jobs as for timber processed in domestic Alaska mills. [cite to a report if available]. Most of these jobs are in rural communities such as Hoonah, Hydaburg, and Kake, where they are most sorely needed.
4. Appendix C similarly mischaracterizes change in other land allocations and resources attributable to completing Sealaska's entitlement, such as old growth and semi-remote recreation. Appendix C both overestimates the acreage to be conveyed to Sealaska and ignores the large areas of roadless and other lands valued for wildlife habitat, recreation, subsistence, scenery and other public use that will be transferred to or released for national forest management. See, e.g., Table C-2, App. C at C-10. Particularly given the

¹ Size-Density Model categories: Low-volume (SD4H) stands, medium-volume (SD4S, SD4N, and SD5H) stands, and high-volume (SD5S, SD5N, SD67) productive old-growth stands which contain the largest tree types as provided by Tetra Tech EC Inc.

² Calculations provided by Tetra Tech EC Inc.

³ The acreages shown are harvest acres identified as suitable (i.e., where areas such as karst, stream buffers, soils, and beach fringe have been removed from the landbase under standards and guidelines. The estimated suitable incorporates a reduction factor for MIRF which further reduces actual mapped suitable acres available for harvest due to fall down.

⁴ As calculated by subtracting the 'Estimated Suitable' acres from the 95,000 Out-of-withdrawal Entitlement Pool and the 327,000 Lands Withdrawn for Native Selection.

large acreage of lands within current ANCSA withdrawal areas that will be released for future national forest management, a net gain in valued land and resources available for public use and protective management is a likely benefit from completing Sealaska's entitlement in the configuration that Sealaska seeks. On the other hand, if Sealaska's entitlement is not soon resolved in this configuration, it is likely that development will occur in many roadless, old growth, subsistence, recreation and other selected areas that are valued for public ownership. The comparison between the 95,000 acres versus the 327,000 acres in roadless status and development and natural setting LUD's is:

	CATEGORY	Out-of- Withdrawal 95,000 Entitlement Pool (Acres)	327,000 Lands Withdrawn for Native Selection (Acres)
Roadless Area Status	Designated 'Roadless Areas'	22,586	277,468
	Roaded Areas	74,672	49,403
	Total⁵	97,258	326,871
Land Use Designations (LUD)	Development LUD	70,405	158,695
	Natural Setting LUD	25,049	160,893
	Total⁶	95,454	326,560

6. Appendix C suggests that heritage, karst and cave, and subsistence resources and uses could be adversely affected by conveyances to Sealaska because of differences in legal requirements applicable to Native Corporation compared to national forest lands. App. C at C-10. This suggestion unfairly ignores Sealaska's established leadership in heritage resource protection and public education and in broader land stewardship, as well as the vital interest that Sealaska's thousands of shareholders have in subsistence, heritage and other resource use of Sealaska and Tongass national forest lands. Even assuming a lesser level of legal protection, there is no reason to conclude there will be a significant net adverse effect for any resource or use attributable to completing Sealaska's entitlement. For example, the Draft EIS documents that even assuming that none of the karst resource on State or private lands in Southeast Alaska is protected, approximately 70% or more of the total will remain protected within the Tongass. Draft EIS at 3-24 to 3-25.
7. The Appendix further fails to recognize that Section 22(f) of ANCSA was included in the statute to affirmatively provide for adjustment of Sealaska and other Native Corporation land conveyances to meet the purposes of the statute, and that continued legislative adjustments to ANCSA entitlement provisions will continue until entitlements are resolved to meet the statute's original promise. As explained in the introductory section of these comments, Sealaska's ANCSA entitlement has been inequitably

⁵ As calculated by Sealaska GIS from Tongass National Forest Designated Roadless area coverage.

⁶ Calculations provided by Tetra Tech EC Inc.

restricted and encumbered by a variety of geographic and other factors. The land exchange provisions were placed in ANCSA to be used to address these kinds of issues. Legislative adjustments to realize the entitlement promised by ANCSA will continue, where existing land exchange and other ANCSA provisions are not sufficient to accomplish this purpose administratively.

8. The Appendix otherwise fails to accurately describe ANCSA land exchange authority. As an example of a basic and glaring error, the Appendix states that an exchange would "enable Sealaska to acquire lands outside the ANCSA withdrawal area, which it is not currently authorized to do under ANCSA." App. C at C-6. ANCSA clearly authorizes Sealaska to acquire lands outside the withdrawal areas *through* exchange; there is little or no need for an exchange to acquire lands within a withdrawal area, and absolutely no restriction in Section 22(f) upon ANCSA exchanges of lands or selection rights from within a withdrawal area for lands outside. As another example, the Appendix represents that exchanges generally must be for equal appraised market value. This ignores the explicit authority in ANCSA as well as ANILCA for exchanges in the public interest to be for other than equal value, and also the impracticability of applying standard federal market appraisal techniques to large remote acreages in Alaska. App. C at C-5, C-7.

The Appendix does appropriately recognize that Sealaska and other land adjustment proposals are subject to change. The Appendix also should recognize that completing conveyances of land to Sealaska in a sustainable configuration is an entitlement under ANCSA and a priority for stabilizing Tongass National Forest management as well as the broader Southeast Alaska economy. The Appendix instead treats Sealaska's land entitlement and adjustment proposal as a negative encumbrance that the Forest Service will address grudgingly at best--a bias that has no place in the agency's mission.

IV. DRAFT EIS VOLUME

The defects evident in Appendix C carry over into various sections in the Draft EIS volume. More generally, the cumulative effects discussion in various sections that encompasses Sealaska and other Native Corporation and State lands also tends to overestimate potential adverse effects and underestimate benefits from timber harvest and other activities on these lands, by not adequately recognizing the protective Best Management Practices and other land stewardship that Sealaska and other owners apply on these lands. These errors are probably not significant for the amendment decision that the Forest Service is considering. The Draft EIS does not depict Sealaska and other land ownership entitlements, adjustments, and projected practices as significant cumulative effects. However, accuracy in presentation remains important to Sealaska.

Our particular comments on the Draft EIS volume are focused upon various sections in Chapter 3, Environment and Effects:

A. LANDS

Our comments on Appendix C also apply directly to the Lands section in the Draft EIS volume. Defects that the Lands section shares with Appendix C include:

Page 3-221—The expected conveyance of 64,000 additional acres to complete Sealaska's ANCSA entitlement is too low. Current estimates range from 65,000 to as high as 85,000 acres or more for Sealaska's share of the ANCSA section 14(h) (8) pool.

Page 3-223—The encumbrance on national forest land management extends to all 327,000 acres in the ANCSA withdrawal areas for Sealaska selections, not just the 171,000 acres identified as Sealaska "selections."

Page 3-223—The statement that Sealaska is not currently authorized under ANCSA to acquire lands outside the withdrawal areas is erroneous. ANCSA Section 22(f) exchange provisions clearly authorize acquiring such lands in an exchange.

Page 3-223—The statement that a revision of TLMP will be required to accommodate an exchange with Sealaska is also erroneous. TLMP already explicitly provides for land exchanges and other adjustments. TLMP, Standards and Guidelines, Lands, Pages 4-31/32. An exchange may be completed without any change to TLMP. Any adjustment of Land Use Designations or other TLMP management direction to accommodate lands conveyed to the national forest in an exchange may be implemented through minor amendment. Any environmental analysis and other procedure for completing such an amendment can be completed as part of the exchange process, or subsequently as part of regular periodic amendment of TLMP. TLMP, Implementation, Pages 5-2 to 5-4

Page 3-226—At the bottom of the page, the referenced adjustment to suitable timber land base made to each alternative for withdrawn lands is an underestimate if the Forest Service has limited it to 171,000 acres of Sealaska "selections" rather than the entire 327,000 acres encumbered within the Sealaska withdrawal areas. If Sealaska's entitlement is resolved satisfactorily within the next several years and the encumbrance is released on the remaining withdrawn acres, the long-term effect on suitable timber land base may be positive and any negative effect is not likely to be significant. However, the Draft EIS should better recognize the negative current effect on available timber land base from existing ANCSA withdrawals and the benefit of release through timely resolution of ANCSA entitlements.

B. TIMBER

Page 3-239—The adjustment to suitable timber land base attributable to ANCSA withdrawals is presumably reflected in Table 3.13-1 on this page, as part of "Forest land withdrawn from timber production" (item 4) and/or "Model implementation factor acreage" (item 12). As indicated in our comments above, if the entire 327,000 acres in Sealaska withdrawal areas is not excluded from suitable lands, the timber base is overestimated. The Final EIS should more completely explain how ANCSA withdrawal areas were factored into suitable timber land base and ASQ calculations, and correct any erroneous assumptions or other defects.

Pages 3-252 to 3-253, 3-260 to 3-266—The same comment as above applies to the presentation regarding suitable land base and ASQ on these pages.

Pages 3-267 to 3-268—Sealaska cannot be expected to sustain harvest of timber from its lands at levels seen over the last decade for more than a few more years, if its ANCSA entitlement is not fulfilled within that time period.

C. SUBSISTENCE

Pages 3-346 to 3-347. A decline in "old-growth forest wildlife habitat capability" due to timber harvest on Native Corporation, Tongass, and other lands does not translate into reduced abundance of deer or other subsistence resources. Managed young growth areas and the roads that access them provide significant deer and other subsistence species habitat and opportunities for subsistence hunting, fishing, and gathering. Managed second growth provides stand structure and wildlife habitat such as cover and forage. Bird species also benefit from the increase in diversity in managed second growth forests. Many wild animals and birds move over, through, and around second growth very successfully, and they continue to thrive.

The Draft EIS elsewhere recognizes at least to some extent that second growth management can substantially prolong and enhance its habitat values for deer and other subsistence species. See, e.g., Draft EIS at pages 3-183, 3-194. Sealaska is a leader in research and management practices to enhance deer and other wildlife habitat capability in second-growth forest areas in Southeast Alaska. For example, on Sealaska lands at West Port Frederick, deer and brown bear are abundant. They use the remaining old growth and the oldest (40 years) to newest harvest units. By silviculturally managing the harvest units, we are maintaining both forage and cover for these species.

D. HERITAGE RESOURCES AND SACRED SITES

Pages 3-351 to 3-354. Sealaska looks forward to continuing to lead and partner with other Native Alaskan entities, the Forest Service, State Historic Preservation Office, and additional stakeholders in protecting and sustaining heritage and sacred sites. As indicated in our introductory comments above, Sealaska currently owns and manages 88 Alaska Native historic sites and there are over 245 additional confirmed sites, averaging 8 to 10 acres per site, to which Sealaska may receive title under ANCSA. As reflected in the Draft EIS, numerous additional heritage and sacred sites remain to be identified.

V. CONCLUSION

The TLMP Amendment Draft EIS contains erroneous and apparently biased information and analysis regarding Sealaska's ANCSA land entitlement and other rights. The Draft EIS exaggerates the negative effects and largely ignores or underestimates the benefits to national forest management as well as the Southeast Alaska economy and communities of completing Sealaska's ANCSA entitlement land conveyances in a sustainable configuration. These defects need to be corrected in the Final EIS.

Sealaska is committed to working with the Forest Service as our largest neighboring land manager to continue to implement TLMP, consistent with Sealaska's ANCSA entitlement and other legal rights and obligations. On behalf of Sealaska Corporation, thank you for giving us the opportunity to provide recommendations that will substantially improve the Final EIS and assist a decision regarding further Tongass Land and Resource Management Plan amendment.

Sincerely,

SEALASKA CORPORATION



Richard P. Harris,
Executive Vice President

cc: Senator Ted Stevens
Senator Lisa Murkowski
Congressman Don Young
Governor Sarah Palin
Alaska Forest Association
Southeast Conference
Alaska Miners Association
Resource Development Council

Ron Wolfe

From: Lee Kramer [lkramer@fs.fed.us]
Sent: Monday, April 30, 2007 3:24 PM
To: Ron Wolfe
Subject: Sealaska Comments on January 2007 TLMP DEIS

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