

under the laws of the State of Alaska," without payment, although relatively few Native villages would fall within that classification and although many local governments represent constituencies which are predominantly non-Native.

In brief, the Federal Field Bill would give the Natives even less land than the drafters intended, and would undoubtedly be the source of much confusion and litigation.

The land proposals of the Interior Bill are substantially different from the proposals in the Federal Field Bill, but they are no more adequate. While the Interior Bill would probably patent more acres of surface to Native villages, it denies the Natives valuable mineral rights; in addition, it does not permit Natives to use non-patented lands for subsistence purposes, even though such use may be well established and essential.

Under the Department's proposal, the Secretary could convey "up to" two townships to certain specified Native villages other than specified Tlingit-Haida villages which can receive no more than one township. (We will not at this time deal with the problems presented by the special treatment of the Tlingit-Haidas, but will leave this matter to their Native representatives and counsel.) Using the Department's list of 205 villages (including ten Tlingit-Haida villages), this can come to a maximum of approxi-