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TO: CONTENT ANAL ENTERPRISE TEAM
FROM: Coeur d Alene Tribe, Phil Cernera

Please find attached our comment on the Proposed plan. Thank you for letting us comment.

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REFERENCE:

COEUR D'ALENE TRIBE

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March 16, 2,000

MEMORANDUM

TO: USFS Contents Analysis Team, USDA Forest Service
FROM: Mr. Phillip Cernera, Restoration Coordinator, Coeur d'Alene Tribe
SUBJECT: Comments on draft document entitled, "Proposed Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resources Management".

The Tribe has had the chance to review the above mentioned document and hereby offer the following comments:

1) In general this document embodies a very important concept in resource management, that being a coordinated holistic ecosystems management approach which incorporates stakeholder participation using consistent scientific tools to monitor results. It is our view, however, that this concept is not new nor easy to turn into, "on the ground" management practices.

2) Page 2, bullet 4: Although outlined that Tribes will be coordinated with, it are uncertain how this will be done. Please explain the mechanism in which to do so.

3) Page 2, Section 2: The Tribe does not want to merely sit back and except what your proposed working group may decide is the best way to sample, or delineate a watershed. Are the Tribes going to be part of the working groups? Bullet 3 appears to suggest that once you decide how best to do things then you will do those things and then provide Tribes with the results. This is not partnership and seems to be business as usual. I recommend that if you want Tribes to endorse such a policy we need to be involved at the ground floor (where the true nuts and bolts of the issues are developed).

4) Page 3, top section, sub number 2: This whole section seems to suggest that new surveys (based on agreed upon protocols) will be conducted in watersheds with significant federal lands. In Idaho, the DEQ, as well as Tribes, have assessed their waters through the State BURP process or some other modified approach. Do you intend to get all the States, and Tribes in Region 10 to jointly agree to one BURP process? If scientifically justifiable we endorse such an approach. A concern we have, however, is the timing for some of our Basin's TMDL's. For waters outside the Reservation the State has already determined their beneficial uses. Will new surveys based

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on agreed upon BURP protocols supercede old surveys.

5) Page 3, number 2, bullet 2: Are not threatened and endangered species presence within a watershed a mandated top priority for protection? If so, why is it omitted from consideration?

Thank you for giving the Tribe the opportunity to comment on this proposed draft. We look forward to your next revision. If you have any questions please feel to contact me, Phillip Cernera (208)-667-4119, at your convenience.

cc: Alfred Nomee, Director Coeur d' Alene Tribal Natural Resource Department
Scott Fields, Water Quality Specialist, Coeur d' Alene Tribe
Ron Peters, Fisheries Biologist, Coeur d'Alene Tribe
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