



Coalition of Coastal Fisheries

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.....Serving the needs of the coastal fishing industry and coastal fishing communities.....

Officers

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Member

Organizations

American Albacore
Fishermen Association

Bandon Submarine Cable
Council

Columbia River Crab
Fisherman's Association

Fishing Vessel Owner
Association

Grays Harbor Gillnetter's
Association

Ilwaco Charter Association

Puget Sound Crab
Association

Purse Seine Vessels Owners
Association

Washington Dungeness Crab
Fishermen's Association

Washington Trollers
Association

Western Fishboat Owners
Association

Westport Charterboat
Association

Willapa Bay Gillnetter's
Association

Willapa-Grays Harbor
Oyster Growers Association

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REACT Consulting Group

Olympia Contact
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September 25, 2013

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Office of Regulatory Affairs and Collaborative Action

1849 C Street, NW, Mail Stop 4141 – MIB

Washington, DC 20240

consultation@bia.gov

Re: Docket ID: BIA – 2013- 0007, RIN 1076 – AF18

The organizations listed at the side of this letter represent fishing interests, thousands of family wage jobs, and other community organizations along the coast of Oregon and Washington including the associated estuaries and rivers. We stand united in support of maintaining the current criteria for recognizing Indian tribes and **strongly oppose** any changes to BIA rule-making process or criteria for acknowledgement of tribal recognition that in any manner lowers the existing, long standing and court tested standards for tribal recognition that would alter the path of previously acknowledgement rejections because the petitioning band or some group did not meet the existing criteria standards for becoming a formally recognized tribe by the United States.

The Coalition sincerely appreciates the fact that the BIA recognized the need and extreme importance of this comment opportunity to allow more time for “interested parties” to participate in this substantial change in BIA acknowledgement process as we did not become aware of the proposal until very recently and after the initial comment period was over. Thank you for this time extension to allow impacted US citizens other than just tribal interests to express our grave concern. The Coalition would appreciate being kept informed and noticed as this proposal moves forward through the process including any petitions of tribes in the northwest United States for tribal acknowledgement.

The Coalition of Coastal Fisheries has an unusually strong interest in maintaining “interested and affected party” status. This attempt to undermine the credibility of the BIA’s time tested tribal recognition standards has the potential to substantially impact Coalition members and their families’ well-being.

This is not the first attempt to undermine the definition of tribal sovereignty or

the tribal continuous existence criteria that has previously and rightfully been rejected.

Proposed changes to 25 CFR Part 83 could result in dramatic impacts to our Coalition members. By reference would also like to enclose the comments of submitted by the Columbia River Crab Fisherman's Association as the Coalitions primary concerns and objection to this tribal acknowledgement criteria standards change.

All the members of the Coalition of Coastal Fisheries listed voice our strong concerns regarding the BIA actions. We can only hope your future decisions can maintain our confidence in the BIA acknowledgement process that once breeched will affect ALL US citizens across this country in multiple ways; many of them very negatively. Initiating new and additional government to government relationships that do not currently exist is a very serious undertaking that must not occur merely as a result of lowering the criteria standards for people recently banding together for the purpose of establishing special recognition status to exercise excessive authorities and benefits long since extinguished by deliberate or inadvertent action of failure to acknowledge tribal status by existing and historically prescribed routes.

Respectfully,

A handwritten signature in cursive script that reads "Dale Beasley". The signature is written in black ink and is positioned above the typed name.

Dale Beasley, President Coalition of Coastal Fisheries