



COEUR D'ALENE TRIBE
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July 2, 2018

VIA EMAIL

Ms. Elizabeth Appel
Office of the Assistant Secretary - Indian Affairs
1849 C Street, N.W., MS-3642
Washington, DC 20240
Email: CONSULTATION@BIA.GOV

RE: Comments of the Coeur d'Alene Tribe on Potential Revisions to the Fee to Trust Acquisition Regulations at 25 C.F.R. Part 151.

Dear Ms. Appel:

On behalf of the Coeur d'Alene Tribe, I would like to submit the following comments to the Department of the Interior's Dear Tribal Leader Letter (DTLL) on October 6, 2017, proposing a broader discussion on the direction of updates to Part 151.

As the Department of Interior seeks input on the potential revisions to the Fee to Trust Acquisition regulations, the Tribe would like to offer these basic comments. In general, the Tribe opposes any changes to the regulations that would:

1. Increase burdens on applicants, including the increase of time it takes to process an application;
2. Authorize increased deference to state and local governments during the application process;
3. Invite challenges to a final determination;
4. Diminish the Secretary's authority or responsibility to take land into trust for Indians; or
5. Otherwise frustrate the land into trust process.

Each of the above comments are also contained and explained in much more detail in the comments of the National Congress of American Indians ("NCAI Comments"), along with specific answers to the 10 questions submitted for Tribal comments. In particular, we would urge the Department not to require tribes to enter into MOU's or other agreements with state and local governments as a condition of an application. The Coeur d'Alene Tribe fully supports the information and rationale outlined in the NCAI Comments and we urge the Secretary to consider such comments with the tremendous weight and deference they are due.

The Coeur d'Alene Tribe appreciates this opportunity to provide comments and we hope the Secretary will give them due consideration.

Sincerely,

A handwritten signature in blue ink, reading "Ernest L. Stensgar". The signature is written in a cursive style with a large initial "E" and a long, sweeping underline.

Ernest L. Stensgar
Chairman
Coeur d'Alene Tribe