247

Memo from the Redwood Valley Reservation Environmental Protection & Assessment Office

Date: July 8, 1999

From: Gregg Young, Environmental Coordinator

To: James Lyons, USDA Sylvia Baca, USDI

Faxed 7/8/99

Regarding: Watershed Management on Federal Lands: Comments on Draft

The Redwood Valley Reservation supports the goals of the Unified Federal Policy for a Watershed Approach to Federal Land and Resource Management. The proposals in the draft policy: to assess, plan, monitor & restore watersheds, and enhance pollution prevention and collaboration with stakeholders are all actions that will benefit everyone in North America. As a small Tribe with an inadequate land base (170 acres, mostly mountains) we are concerned with any proposal that will add unfunded mandates and responsibilities. I have the following questions and comments:

"The policy does not apply to State, Tribal, or private lands." While this is comforting, at least two Federal agencies do not necessarily follow this principle. The BIA claims that all Tribal lands are Federal lands, and their trust responsibility involves oversight of all projects on Federal, and thus Tribal, lands. Will the BIA be given jurisdiction for enforcement of policies coming out of this plan? Will funds for meeting the goals of priority watersheds be funneled through the BIA, or can Tribes gain primacy status and manage their own programs?

The EPA is seriously considering promulgation of water quality standards for Tribes. This could impact Tribes without the land or financial resources to implement the standards and criteria arising from such an action. Will funds be available (beyond competitive grants) to assist Tribes in watershed management programs?

Will there be programs available to help Tribes purchase or manage watersheds that once were ancestral lands? Many of the Tribes in California have an inadequate land base; some have no land base at all. Could this program help expand ownership and jurisdiction of Tribes over watersheds in their ancestral areas, and enhance both the quality of the environment while restoring traditional uses of the resource?

We look forward to the further development of this proposal, and share the principles and goals behind this program.

What is BIAs role in developing / implementing policy

Gregg Young,
Environmental Coordinator