

Summary of Comments received during NRCS Teleconferences with Indian tribes

These summary statements reflect comments made by Indian tribes during NRCS-hosted teleconferences. NRCS intends to discuss these comments through further consultation and where needed, provide additional information to clarify any points of confusion.

The NRCS welcomes your comments at any point during this process. Please feel free to use the comment form provided on this website (http://www.achp.gov/docs/programmatic_agreement_form.pdf) or contact Sarah Bridges, NRCS Federal Preservation Officer, directly ((202) 720-4912, sarah.bridges@usda.gov).

Teleconferences with Indian tribes held on Dec. 20, 2011; Jan. 18, 2012; Feb. 7, 2012:

Not opposed to extending the duration of the nationwide PA while consult and work on new program alternative. Not opposed to development of prototype agreement.

NRCS should develop a plan to consult with tribes on a regional basis in the development of the new nationwide program alternative, then can address specific issues. Many tribes may want to sit down face to face with NRCS (and bring attorneys). Noted limited utility of national teleconferences.

Many more THPOs now (than in 2002); new issues to face in developing new nationwide program alternative.

National agreement might be disadvantageous to tribes; national agreement does not really reach tribes; look to agreements in specific regions. Need training on use of PA and/or new nationwide program alternative and how it could benefit tribes.

State-wide approach might also not work for many tribes; many tribes may want individual agreements and consultation procedures with NRCS. Some tribes might be interested in an agreement with SHPO and NRCS, if could address tribal needs (and not sure what to do if disagreement).

Need confidence to go back to federal agency if run into problems; want to develop good working relationship. Need to understand how to reach decision-makers. Want to see more attention and response from NRCS to recognize trust relationship. Some tribes want to consult only with decision-makers.

In dealing with PAs and excluded actions, tribes need to be consulted on which undertakings may/may not affect historic properties.

Need further discussion about consultation for undertakings taking place and/or affecting historic properties off tribal lands; noted general concern about lack of consultation off tribal lands.

Want assurance that identification and evaluation work is being done completely and accurately; so many unevaluated sites; NRCS should consult with tribes before doing archaeological survey; without tribal input, cannot fully evaluate many sites or properties of sacred or cultural significance.

Tribes need a foot in the door at the early consultation stage; seems like agencies are just approving projects. Need to define APE and start identification process with appropriate knowledge.

Geography of land has a lot to do with evaluation of historic properties; why regional agreement needs to be in place.

Tribes need funding for work under agreements.

Agency guidelines control what actually happens; want to see NRCS guidelines.