



Little River Band of Ottawa Indians

Office of the Tribal Council

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November 21, 2016

Office of the Assistant Secretary – Indian Affairs
Attn.: Office of Regulatory Affairs & Collaborative Action
1849 C Street, NW, MS 3071
Washington, DC 20240

To whom it may concern,

On November 15, 2016, the Little River Band of Ottawa Indians shared their concerns with federal consultation efforts and rules at the consultation meeting in Minneapolis, Minnesota. This letter serve to memorialize our concerns. We hope that together, tribes and the federal government can find a way to make consultation efforts more meaningful and efficient.

1) Recognition of support or opposition

If Tribes take the time to pass resolutions or send letters of support or opposition. Those efforts should be recognized in the consultation and comment period process. Tribes should not have to again submit comments with the rest of the public. Our Tribe was once advised that even though we submitted letters or met with federal officials that we still need to submit comments during the comment period “like everybody else”. We find very little meaning in submitting these types of documents if we will then after have to submit formal comments.

2) Timeliness of consultation in relation to decision making

Tribes should be consulted months in advance of new policy or law taking effect, not weeks. Tribes need time to research, investigate, or prepare responses to proposed federal legislation like any other affected agency would require. It feels like an afterthought when Tribes are consulted just weeks before the intended action takes effect. It also

appears that no time has been left to adjust laws in response to our concerns or suggestions.

3) Notification to Tribes

It is insufficient for Tribes to only receive two or three weeks' notice. Our elected leaders, like federal elected leaders, are busy and have meetings scheduled months in advance. We often miss out on important consultation efforts because so little advanced notice was given.

4) Meaningful

The practical purpose of consultation is currently unclear to this Tribe. It is our position that the intent of all consultation should be to reach a compromise between the parties involved. This is especially true when our sovereign immunity, right to self-governance, or property interests are at stake.

We appreciate the opportunity to share our comments with you. We hope to see significant and meaningful changes occur to the federal consultation process. We'd be happy to discuss our comments further will you should you wish.

Sincerely,



Larry Romanelli
Ogema



Virgil Johnson
Tribal Council Speaker