



**THE CONFEDERATED TRIBES
of
THE COLVILLE RESERVATION**
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March 17, 2000

Judi Johansen
Administrator
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

Re: Cultural Resources Compliance in the All-II/Biological Opinion

Dear Ms. Johansen:

The Confederated Tribes of the Colville Reservation (CCT) is engaged with the agencies that make up the 'Federal Caucus' in assessing the All-H/Endangered Species Act process for the Columbia River system. As new information is released from the many studies being conducted to assess the different alternative approaches that will contribute to the 2000 Biological Opinion, we are struck by the general lack of reference to cultural resources.

We understand that the Biological Opinion necessarily focuses on effects of system operations to fisheries, but remind the Federal Caucus member agencies that implementation of changes to system operations is an undertaking under the National Historic Preservation Act. Under that act, the All-H process needs to be compliant with the Section 106 process. Each of the different alternatives being considered needs to be examined for their potential effects on cultural resources. Further, we believe that the Advisory Council on Historic Preservation needs to have an oversight role of the All-H process to verify that the Section 106 process, including meaningful consultation with interested Native American Tribes is conducted appropriately.

Further, while tribes are to be principal players in the All-H process, funding for the tribes' cultural resources departments to participate has not been provided. This point was driven home with the release of the latest flood of documents and modeling information related to the different alternatives being considered. Determining what effect these alternatives will have on cultural resources within the CCT's area of interest will require direct funding of the CCT's History/Archaeology Department by the federal agencies.

Sincerely,

Mathew Dick
Chairman, Cultural Resources Committee

cc. J. William McDonald, Regional Director, Bureau of Reclamation
General Carl Strock, Division Engineer, U.S. Army Corps of Engineers