



COEUR D'ALENE TRIBE

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REFERENCE:

Sent via Electronic Mail

November 6, 2015

Paula Wilson
Idaho Department of Environmental Quality State Office
1410 N. Hilton
Boise, ID 83706
paula.wilson@deq.idaho.gov

RE: Docket No. 58-0102-1201 – Idaho's Proposed Water Quality Standards

Dear Ms. Wilson:

The Coeur d'Alene Tribe, Lake Management Department appreciates the opportunity to provide comments on the Idaho Department of Environmental Quality's (DEQ) proposed water quality standards. Throughout the negotiated rulemaking process, the Lake Management Department along with other Idaho tribes have clearly and consistently communicated the need to protect tribal members that currently and/or in the future intend to consume fish at subsistence levels. Unfortunately, DEQ has proposed water quality standards for Idaho's waters that were calculated using substantially reduced levels of protection for tribal people as compared to the general population. Idaho's choice to limit the protection levels for tribal populations in Idaho threatens our tribal waters and the current and future ability of tribal members to safely practice a subsistence lifestyle. DEQ's proposed standards are also weaker than those proposed by all other states and tribal governments in the region.

As you may know the Coeur d'Alene Tribe (like other Idaho tribes) has and continues to restore its fisheries with the ultimate goal of fully restored stocks of native resident and anadromous fish within and surrounding the Coeur d'Alene Reservation. If Idaho's proposed standards are put in place these fisheries would not be safe to consume at a subsistence level and would jeopardize the health of Tribal members and the Tribe's restoration goals for our region.

The Lake Management Department along with the other Idaho Tribes, EPA, CRITFC, and USRT has been actively involved during this rule making process. We have and continue to support these other Tribes and agencies and their respective comments and concerns on this matter. We encourage DEQ to reconsider its proposed fish consumption rate for one which would be more protective of subsistence and high quantity fish consumers (tribal and non-tribal) throughout Idaho.

Sincerely

A handwritten signature in blue ink that reads "Phillip J. Cerner (For)".

Phillip J. Cerner
Director, Lake Management Dept.
Coeur d'Alene Tribe

Cc: Dennis McLerran, Administrator, EPA Region 10