

Section 3: Management Objectives and Strategies

This section describes in detail the five management objectives designed to support the primary 2009 LMP goal, along with rationales and strategies to achieve them. The Tribe and DEQ expect that the 2009 LMP goal and management objectives will be the key reference points for the full range of LMP decision making. They are intended to support the adaptive approach to lake management described in Section 5 of the 2009 LMP, including performance actions and milestones to support accountability. Budget estimates for achieving objectives and strategies can be found in Section 6.

3.1 Objective 1 – Improve Scientific Understanding of Lake Conditions through Monitoring, Modeling, and Special Studies

Rationale

Coeur d’Alene Lake has been the focus of considerable scientific investigation, through routine monitoring and special studies. An improved understanding of water quality trends is emerging, as summarized in Section 2. The complex interactions between the physical lake processes, nutrients, phytoplankton production (microscopic algae growth), and heavy metals require future studies to improve knowledge and the basis for lake management decisions (see Appendix B).

An ongoing science program is needed to ensure that management actions are effective and efficient. The program will be annually evaluated in a collaborative, transparent process. Scientific data will be reviewed, analyzed and reported annually thereby keeping the state of the lake information current for all stakeholders. Work plans linked to Objective 1 will be reviewed with suggestions made by scientific staff of governmental agencies, universities, and consulting firms. There are additional monitoring and study efforts identified in the Management Action Tables (MATs) that merit further consideration (Appendix C).

The strategy for achieving Objective 1 has the following four components:

- 1) Establish water quality “triggers”
- 2) Perform core routine monitoring: lake and rivers
- 3) Develop technical tools to support lake management
- 4) Conduct special studies

Each strategic component is described below.

Strategy: Establish Water Quality Triggers

There are several key water quality variables that need to be tracked in order to measure the long term health of the lake. These include, but are not limited to: levels of zinc, lead, cadmium, phosphorus, phytoplankton, and dissolved oxygen. The 2009 LMP establishes triggers for each of these variables and others, to gauge lake health. An annual comprehensive monitoring program produces trend data that provides an “early warning system” for deteriorating conditions. Ideally, this will allow corrective steps to be taken before conditions deteriorate to the point they would be very difficult and expensive to reverse, i.e., exceeding a trigger. See Section 5.1 for tables of water quality triggers.

In the event that monitoring data reveals trends that approach a trigger level for one or more constituents, this will prompt a comprehensive review to identify the causes of the trend and guide development of a corrective management response. Modeling will also be used as a tool to estimate additional nutrient reductions needed to restore water quality to below trigger levels. The MATs will be reviewed to verify implementation status and identify "next steps" for reducing nutrient inputs. Additional management actions will be prioritized, and may include: increasing the implementation of projects, targeting critical sources for reduction, reviewing Best Management Practices (BMP) effectiveness, and reviewing regulatory effectiveness (adequacy of enforcement and of rules). This adaptive management approach using water quality trends and triggers to signal the need for additional actions, followed with ongoing monitoring to determine the lakes response to these actions; will provide for a proactive and measured strategy for protecting water quality.

Strategy: Perform Core Routine Monitoring

The core routine monitoring program has two parts: the lake and rivers. Key activities for each part are discussed below. The locations of monitoring sites for the lake are shown in Figure B1 and for the rivers in Figure B2 (Appendix B).

Lake

A long-term core monitoring program is a critical element of an effective LMP for these reasons:

- Provides a record of key water quality variables captured during important periodic, flood-flow events
- Provides a long-term annual trend record that captures the considerable year-to-year variability of water quality data
- Provides a consistent, long-term record of dissolved oxygen profiles, the underlying key variable for a nutrient-based LMP to manage metals in bottom sediments
- Allows evaluation of total phosphorus, chlorophyll *a*, and phytoplankton composition trends and the observed declining trend of zinc concentration in upper waters

- Allows evaluation to determine if the significant higher phosphorus and chlorophyll *a* concentrations in southern waters contribute to the observed increases in northern waters as water flows from south to north
- Provides validation information for future use of the ELCOM-CAEDYM computer model as a tool to further understanding of lake conditions (see Computer Modeling below)
- Allows a data-driven adaptive management approach to the 2009 LMP based on yearly water quality information

In 2007 the Tribe and DEQ began a routine monitoring program, previously conducted by the USGS. This was initiated by development of a Quality Assurance Project Plan (QAPP). The lake monitoring program uses an EPA laboratory for sample analysis of metal concentrations; therefore EPA reviewed and approved the QAPP. If EPA continues to provide laboratory support to the monitoring program, it will review and approve the QAPP annually. The core routine monitoring program for the 2009 LMP is presented in Appendix B. Additional monitoring program details are found within the QAPP. An electronic version of the QAPP is on the DEQ website www.deq.idaho.gov (use the “Find it Fast” menu and click Coeur d’Alene Lake Management).

Rivers

Rivers are significant sources of nutrient input to the lake. The core monitoring program requires sampling stations in key river locations. The sampling stations include existing Basin Environmental Monitoring Plan (BEMP) sites, and additional new stations on the Coeur d’Alene and St. Joe rivers to fill data gaps. Appendix B describes the monitoring program in detail.

Strategy: Develop Technical Tools to Support Lake Management Efforts

Computer Modeling

In addition to reacting to past events, effective lake management requires the ability to predict the effects of future activity and plan actions to prevent or reduce water quality impacts. The Tribe and DEQ are working collaboratively to add critical predictive capability through the use of computer modeling. Development of a model customized for Coeur d’Alene Lake (ELCOM-CAEDYM) was supported and funded through the Coeur d’Alene Basin Environmental Improvement Project Commission (BEIPC) from an EPA CWA grant.

In general, the model simulates important processes within the lake system such as: 1) inflow loading of metals and nutrients, and river plume flow through the lake, 2) sediment-water interactions, 3) primary production, and 4) organic matter cycling within the water column. In addition, the model can be used to predict dissolved oxygen profiles which can be validated with actual data. Use of the ELCOM-CAEDYM model will greatly enhance understanding of the complex dynamics within the lake system, and has the potential to produce predictive results based on future land use changes within the basin (Appendix B).

Strategy: Conduct Special Studies to Answer Key Questions

In addition to core monitoring described earlier, special studies to answer key questions that relate directly to the 2009 LMP objectives are needed. These studies will improve knowledge and understanding of internal nutrient cycling, metals release from sediments, foodweb toxicity, subsurface sewage systems impacts, and other factors (Appendix B). This strategy is consistent with the recommendations from the National Research Council of the National Academy of Sciences (NRC/NAS, 2005).

3.2 Objective 2 – Establish and Strengthen Partnerships to Maximize Benefits of Actions under Existing Regulatory Frameworks

Rationale

The 2009 LMP relies on LMP partners to use existing regulatory tools and management actions to address nutrient and sediment inputs to Coeur d’Alene Lake. The Management Action Tables, or MATs, are a critical feature of this approach (Appendix C). The MATs document the diverse jurisdictions of local, State, Tribal, and Federal agencies, as well as existing programs, BMPs, codes, and regulations that influence water quality. In 2006, the Tribe and DEQ developed a protocol for conducting routine performance audits and conducted an initial audit of the MATs to:

- Determine the extent to which the management actions identified in the 1996 LMP are being implemented
- Evaluate the effectiveness of implemented management actions
- Identify BMPs that are not being implemented correctly or fully
- Evaluate funding and resources needed to accomplish the management actions
- Assess the commitment to continue the management actions and if needed, recommend/develop new BMPs, management strategies, and/or regulations and standards

The strategy for achieving Objective 2 has the following five components:

- 1) Use the inventory of existing authorities found in the MATs to coordinate partnerships to implement the 2009 LMP
- 2) Improve understanding of existing authorities, programs, and activities and their potential to support the 2009 LMP goal and objectives
- 3) Engage with local, State, Federal and Tribal land managers to influence yearly workplans and support activities that will further the LMP goal
- 4) Collaboratively implement projects when appropriate
- 5) Repeat the audit at 5-year intervals to evaluate progress

Each strategic component is described below.

Strategy: Use the LMP MATs to Coordinate Partnerships

A set of tables identifying management entities and actions affecting lake water quality in the Coeur d'Alene basin was created as part of the 1996 LMP effort. These MATs (Appendix C) were updated and revised through an audit process conducted during 2007 by the Tribe and DEQ using EPA CWA grant funding, available through the BEIPC. The detail provided in the MATs is the primary source of information that will be used to develop and strengthen partnerships to support lake management efforts.

Strategy: Improve Understanding of Authorities

Through the MAT audit process described above, DEQ and the Tribe will improve understanding of the most current authorities of other agencies related to accomplishing the overall LMP goal (Appendix E). This includes, but is not limited to: applied BMPs, water quality improvement or remediation projects, policy changes within government agencies, revisions of existing rules and regulations, and introduction of new rules and regulations by management agencies. This ongoing process includes, but is not limited to: field audits, phone contacts, meetings, workshops, and coordination with various water quality groups and commissions.

Strategy: Engage with Land Managers to Identify Opportunities in Annual Workplans

The Tribe and DEQ will consult with LMP partners during their respective annual workplan development processes to identify opportunities to influence work priorities that will support the lake management goal and objectives. The MATs will provide a shared point of reference about authorities and programs. This information will be used for discussing and including activities by these partners in their annual workplans. Other priorities and implementation activities may be incorporated in the DEQ/Tribe yearly LMP workplan.

Strategy: Collaborative Projects

In situations where a collaborative effort is appropriate, the Tribe and DEQ will support LMP partner-projects that are consistent with the 2009 LMP goal. As an example, the recent Mica Creek nutrient reduction project involved numerous partners, including active participation by the landowner. Funding was provided by a CWA grant, settlement monies, and in-kind services to implement the project.

Strategy: 5-year Audit and Update of MATs

The audit process described previously will be conducted every five years. The Tribe and DEQ will also evaluate implementation of actions specified in the MATs in conjunction with the annual workplan development process.

3.3 Objective 3 – Develop and Implement a Nutrient Reduction Action Plan

Rationale

The magnitudes and locations of nutrient sources in the Coeur d' Alene Lake Basin need to be more specifically identified. Once identified, priorities for addressing these sources will be developed.

The strategy for achieving Objective 3 has the following four components.

- 1) Design and conduct a basin-wide nutrient source inventory to determine relative contributions
- 2) Use the basin-wide nutrient source inventory and ongoing monitoring to prioritize site specific projects for implementation in coordination with the management agencies identified in the MATs
- 3) Incorporate the Total Maximum Daily Load (TMDL) process under the CWA into the nutrient reduction plan
- 4) Incorporate appropriate mitigation measures required by FERC for relicensing of the Avista hydroelectric project into the nutrient reduction plan

Each strategic component is described below.

Strategy: Basin-wide Nutrient Source Inventory

Development of a basin-wide nutrient source inventory is an essential first step to identifying and prioritizing management action for nutrient reduction. This inventory will focus on nutrient and sediment loading at key hydrologic locations across the basin. Samples will be collected during various times of the year to develop an understanding of loadings throughout the basin. There will also be compilation of existing information from other sampling programs, wastewater treatment plants, land-use mapping, and other sources. The product will be a Geographic Information System (GIS) environmental database layer that clearly depicts load distribution throughout the basin. This information will provide the Tribe, DEQ, and LMP partners with data to support future decisions about where to focus nutrient reduction work.

Strategy: Prioritize Projects Based on Inventory

The 2009 LMP recognizes the need to implement projects to reduce nutrient loading in the lake. Decisions on which projects will be implemented will depend on a number of factors, such as results of the nutrient inventory, routine monitoring, cost effectiveness, landowner participation, funding sources, and coordination with existing programs described in the MATs. Examples of ongoing programs and projects are: upgrading wastewater treatment facilities, stabilization of eroding river and stream banks, reduction of sediment loading from state and federal public lands, implementing agricultural BMPs, and enforcing land development ordinances.

Opportunities for upgrading wastewater treatment and disposal practices in the basin must be explored for communities discharging to the lake or its tributaries, such as the Silver Valley,

Harrison, Plummer, and St. Maries communities. In addition, wastewater treatment upgrades may be needed in populated and/or developing bays on the lake or adjacent uplands. Costs for upgrading the wastewater treatment and disposal infrastructure in the basin for the purpose of reducing nutrient inputs to the lake will be large. As an example, in 1991, a sewer system that eliminated near-shore subsurface disposal sewage systems was installed in Kidd Island Bay for approximately 350 users, at a cost of approximately \$2.6 million (in 2006 dollars).

Strategy: Incorporate TMDLs into the Nutrient Reduction Plan

A component of the nutrient reduction plan involves the Clean Water Act TMDL process for both DEQ and the Tribe. Under CWA section 303(d), DEQ and the Tribe are required to identify waters that are not meeting Water Quality Standards (WQS) or supporting beneficial uses. This process is ongoing. For these impaired waters, a TMDL is prepared for each pollutant. A TMDL is a calculation of the maximum quantity of a pollutant that can be added to a specific water body from all sources, human and natural background; without exceeding WQS. Idaho's 303(d) list of impaired waters and TMDLs must be approved by EPA, and Idaho also must incorporate approved TMDLs into planning processes and water quality management plans. The EPA has developed a national list of impaired waters in Indian Country. Several of these streams are within the Coeur d'Alene Reservation. Figure 9 shows all waters within the Coeur d'Alene Lake Basin that are impaired by metals, sediments, nutrients, or bacteria (mostly sediment and metals), and a list of them is found in Appendix D. Implementation projects under the TMDL program will be incorporated into the LMP nutrient reduction plan.

Lake Metals TMDL

The portion of Coeur d'Alene Lake, north of Hidden Lake, within State of Idaho jurisdiction, is included in Idaho's 303(d) list of impaired waters with metals as the pollutant of concern. The portion of Coeur d'Alene Lake, north of Hidden Lake, within Tribal jurisdiction, is currently not included in EPA's Indian Country 303(d) list.

DEQ and EPA completed a metals TMDL for the Coeur d'Alene River subbasin, including Coeur d'Alene Lake, in 2000. The Idaho Supreme Court subsequently ruled that the required rule making procedures were not followed in setting the TMDL, making it null and void. State legislation in 2003 clarified that for all other waters in Idaho, rule making procedures are not required for TMDLs. The legislation, however, kept the rule making requirement identified by the Idaho Supreme Court in place for a metals TMDL for the Coeur d'Alene River subbasin. To date, there is no EPA approved metals TMDL for the lake, for either State or Tribal areas.

EPA has issued new point source discharge permits for the Coeur and Hecla mines that have significantly reduced the amount of metals they can discharge. The EPA is also implementing remedies identified in the OU2 and OU3 RODs, as described in Section 1.2, to reduce incoming metals to the lake. The 2002 ROD also includes reference to an LMP to address issues related to metals in the lake and lakebed sediments.

The Tribe and DEQ are not proposing a TMDL for metals as part of the 2009 LMP, at this time. The 2005 Idaho Legislation (House Bill 145) directs DEQ to revisit all TMDLs every five years

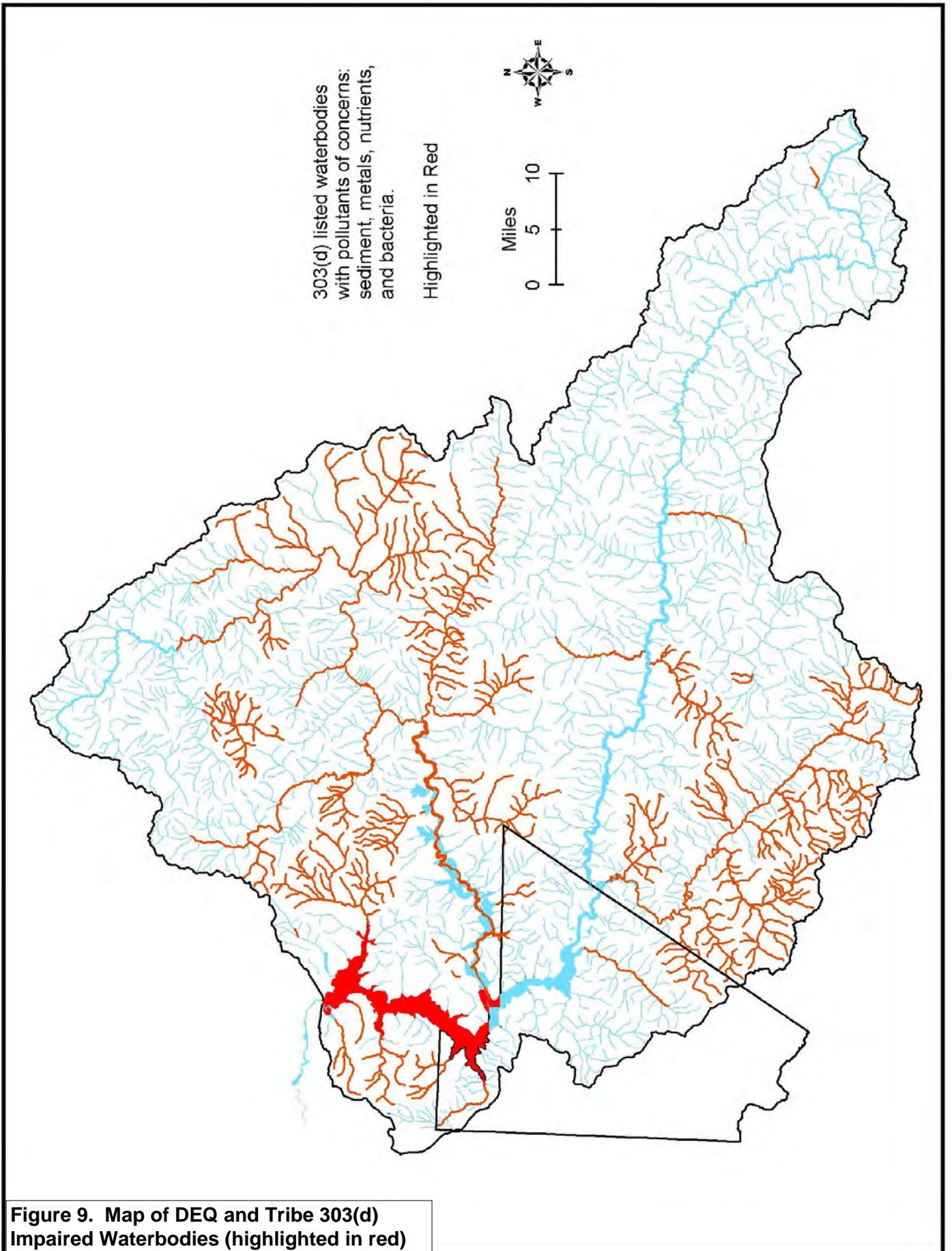


Figure 9. Map of DEQ and Tribe 303(d) Impaired Waterbodies (highlighted in red)

(Idaho Code §39-3611(07)). DEQ has established a long term 5-year review schedule. The voided metals TMDL, for both the South Fork Coeur d'Alene River subbasin and the Coeur d'Alene Lake subbasin, will be revisited beginning in 2009. Progress on implementation of the OU3 ROD for the basin, analysis of the BEMP data, and analysis of the lake water quality data collected by DEQ and the Tribe will be key references in completing this review. The Coeur d'Alene Tribe will coordinate with EPA and DEQ on this review. In essence, EPA's remedy for the basin functions as a metals implementation plan for the South Fork Coeur d'Alene River and the lake, without having a TMDL in place.

Lake Nutrient TMDL

The State of Idaho has a narrative standard for nutrients applicable to those surface waters of Coeur d'Alene Lake not within the present-day Reservation. The Tribe has a similar proposed narrative nutrient standard for approved Reservation waters (i.e., Coeur d'Alene Lake and the St. Joe River within the present Reservation, not including waters of Heyburn State Park). These narrative standards are not currently exceeded by surface water nutrient conditions in Coeur d'Alene Lake. The lake is currently not identified as an impaired water body under CWA Section 303(d) with respect to nutrients. A TMDL to address lake nutrient conditions is, therefore, not being developed at this time. The Tribe and DEQ view the LMP as a functional equivalent to a nutrient TMDL. This status could change because dissolved oxygen conditions in the southern lake do not meet the applicable proposed Tribal standards.

DEQ and the Tribe share common concerns regarding dissolved oxygen concentrations throughout the lake and mutual interests in developing agreed-upon actions in the LMP to address those concerns, as outlined in Section 5 of the LMP (performance actions and milestones).

Strategy: Avista/FERC Mitigation Program

For the last ten years the Coeur d'Alene Tribe and the State of Idaho have been parties to the Federal Energy Regulatory Commission's (FERC's) relicensing process for the Post Falls Hydro-Electric Dam (HED), owned by Avista Corporation. As part of this process, project operation impacts on natural resources were determined and mitigation measures were identified. These mitigation measures will become part of the new fifty (50) year license and will be required to be implemented during the duration of the license or until the mitigation projects are fully implemented.

Both the Tribe and the State of Idaho have reached separate agreements for mitigation, including work that will help manage nutrients entering the lake: 1) stream bank and lake shoreline bank stabilization, 2) riparian restoration or replacement, 3) invasive weed management, 4) water quality monitoring, and 5) cultural resource protection. The Tribe and DEQ envision that during the development of yearly LMP work plans, prioritization of mitigation projects will be evaluated and coordinated.

3.4 Objective 4 – Increase Public Awareness of Lake Conditions and Influences on Water Quality

Rationale

There is general public appreciation in the basin about the importance of maintaining good lake water quality. However, there is limited understanding of key components of water quality, and how lake water quality is affected by human activities such as construction, septic tank maintenance and drainfield performance, and the use of chemical fertilizers. The 2009 LMP must establish a shared public understanding of water quality and a commitment to its protection on a daily basis. This public understanding and commitment are essential to build support for funding to implement lake management activities. Individual's choices to protect water quality have significant impact. The importance of education in addressing environmental problems in freshwater ecosystems is recognized and promoted by the National Research Council (NRC, 1996).

Specific components of this overall strategy will include items 1 and 2, and based on a “needs assessment,” may include other items as outlined in 3 through 5:

- 1) Conduct a public education and outreach needs assessment
- 2) Develop and implement an education and outreach services plan including Lake*A*Syst
- 3) Establish a lake stewardship center
- 4) Develop and maintain a science and resource library
- 5) Coordinate with schools and youth organizations

Strategy: Conduct a Public Education and Outreach Needs Assessment

Currently, there is a wide range of lake related information circulating in the community. For the most part, this information can be found with various governmental agencies, environmental groups, and private businesses. Although the information currently available addresses a myriad of lake issues, it is uncertain whether it is tailored to the wants and needs of the basin community. DEQ and the Tribe regularly receive requests from citizens and community organizations for services related to lake protection. These include: presentations, workshops, “how-to” materials and instructions, citizen monitoring, newsletters, organizing lake protection events, and developing project proposals.

These services, although important, may not constitute a complete education and outreach program. The Tribe and DEQ agree that public education and outreach is a critical component of the LMP. The initial step will be to conduct a needs assessment and use the results to design the education and outreach program.

Strategy: Education and Outreach Services Plan including a Lake*A*Syst Program

Staff will use the results of the needs assessment to develop an annual education and outreach plan that will outline the services desired by the community to increase awareness and understanding of lake water quality. This plan could include, among other things, a lake stewardship center, a science resource library, and school/youth programs. More details about these components follows.

A program that has already proven to be effective and successful in the surrounding lake communities of Priest, Pend Oreille, and Hauser, is the Lake*A*Syst Program. If desired by the community, the Tribe and DEQ could modify the existing materials and tailor the program for Coeur d'Alene Lake. This is a program targeted to individual landowners focusing on practices they can use to reduce water quality impacts from activities on their property. Information and use of "lake friendly" products, activity specific BMPs, and training programs for erosion and sediment control practices, are some examples of program components. The success of this program has been largely due to the delivery of the program by experts in water quality, conservation groups, educational or non-governmental organizations, and the commitment of individuals to apply stewardship practices.

Strategy: Lake Stewardship Center

If supported by the needs assessment above, a lake stewardship center would be established to create a focal point for community lake protection, and a resource base for increasing awareness and understanding of lake conditions and actions that can be taken to protect water quality. Since the lake is the "heart" of the community, locating a lake stewardship center in Coeur d'Alene would provide easy access to basin residents and visitors alike. It would be a symbol of the partnerships needed, and the community commitment of support to meet water quality protection goals. This center would be staffed with support from DEQ and the Tribe. A variety of science and resource materials would be housed and maintained for public use. Education and outreach services would be developed and offered in various media, targeting different audiences: general public, lake users, lakeshore property owners, civic groups, associations, government agencies, businesses, and schools.

There are many options for partnerships and locations for a lake stewardship center. Space donations, especially along the river educational corridor or downtown, will be pursued. North Idaho College, North Idaho Museum, Coeur d'Alene Chamber of Commerce, the Coeur d'Alene Library, or other strategically located and compatible area businesses, are all possibilities.

Strategy: Science and Resource Library

There is a considerable body of knowledge contained in published documents on the water quality of Coeur d'Alene Lake. A library of documents, including: project completion reports, technical guidance, monitoring reports, standard operating procedures, and quality assurance project plans, would be compiled and maintained at the lake stewardship center. Currently, large quantities of data and scientific documents exist with the Tribe, DEQ and EPA. There are also

publicly accessible electronic databases (e.g., STORET) that would be made computer accessible at the lake stewardship center.

A wealth of resource materials already exist that can increase awareness of lake water quality and provide tools for protection. The center would compile and maintain resource documents for public use, including: agency rules and regulations, local ordinances, workshop opportunities, demonstration project information, field trip and tour schedules, and other relevant information. This library would be made available to the public in electronic and hard copy form, and housed in the lake stewardship center.

Strategy: Coordination with Schools and Youth Organizations

It is important for people of all ages to understand what they can do to become lake stewards. The school system is the logical "delivery system" to spread this message, throughout the community. Staff of the stewardship center will therefore work with primary, secondary, post secondary schools, and youth summer camps. The emphasis will be to heighten student observation skills to better understand that lake water quality affects their quality of life and that their actions can affect lake health.

3.5 Objective 5 – Establish Funding Mechanisms to Support the LMP Goal, Objectives, and Strategies

Rationale

The importance of this objective cannot be over-emphasized. The 2009 LMP goal of protecting lake water quality can only be achieved through reliable funding in amounts sufficient to carry out the specific strategies designed to achieve it. The basic approach of relying on existing legal authorities and programs described in the MATs to achieve the 2009 LMP goal requires financial support for these existing programs. A lack of reliable funding in the past for MAT implementation has been a significant obstacle to effective collaborative lake management. The 2009 LMP attempts to find a balance between funding needs and appreciation for the challenges associated with securing that funding. Section 6 of this document provides details for the 2009 LMP budget, schedule, and contingencies. The Tribe and DEQ consider LMP partners and the broader public essential to securing necessary funding from all sources, both public and private.

The four elements of the funding strategy are:

- 1) Identify core needs
- 2) Prioritize projects
- 3) Identify funding sources and secure commitments
- 4) Demonstrate fiscal accountability

These strategic components are described below.

Strategy: Identify Core Needs

The 2009 LMP recognizes the importance of setting priorities to accommodate the challenges posed by funding limits. The Tribe and DEQ have identified the following core needs for funding:

- 1) Conduct core routine water quality monitoring, Objective 1
- 2) Develop a basin-wide nutrient source inventory, Objective 3
- 3) Use MATs to coordinate and implement existing programs with LMP partners, Objective 2
- 4) Educate the community and increase awareness of lake conditions, Objective 4

Strategy: Prioritize Projects

Projects will be prioritized based on different criteria, such as cost effectiveness, community acceptance, willingness of landowner participation, availability of funding, partnerships, and applicable regulatory requirements. The cost to implement nutrient reduction projects based on the planned, basin-wide nutrient inventory (e.g., municipal sewer upgrades, bank stabilization, lakeshore/shallow bay sewer development, or TMDL implementation), will be significant. Obtaining project funding incorporates the vital relationship between community values and regional understanding of the importance of lake water quality. A collaborative approach will be used to develop yearly workplans and secure funding.

Strategy: Identify Funding Sources and Secure Commitments

The funding strategy consists of several mechanisms:

- 1) Annual budget requests and appropriations from Federal agencies, State, Tribal, and local governments
- 2) Annual congressional budget requests and appropriations
- 3) Local business community matching funds for cooperative projects
- 4) Other fundraising initiatives, like foundations, endowments, and special grant opportunities

Cultivating this funding pool will depend, in part, on the political acknowledgement of the importance and need for implementing the 2009 LMP. Advocacy of all basin partners will be necessary to garner political support. Commitment of partners to continue to prioritize and pursue funding for their respective LMP implementation activities, in coordination with the overall 2009 LMP implementation effort, is essential.

Strategy: Demonstrate Fiscal Accountability

The Tribe and DEQ are committed to a principle of accountability for the 2009 LMP spending. In practice, this will require attention to diverse sets of standards consistent with different funding sources, both public and private. The Tribe and DEQ intend to use generally accepted procurement and accounting protocols as established by State Statute or Tribal Code and will present accounting details in each year's annual LMP report. This information will be available to LMP partners and the general public.