

The Confederated Tribes of the Grand Ronde Community of Oregon

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June 17, 2011

Ms. Tracie L. Stevens, Chairwoman
National Indian Gaming Commission
1441 L Street, NW, Suite 9100
Washington, DC 20005

*via electronic submission to
reg.review@nigc.gov*

Re: Comments on NIGC's Preliminary Draft of Proposed Changes to Facility Licensing Regulations

Dear Chairwoman Stevens:

The Confederated Tribes of the Grand Ronde Community of Oregon ("Grand Ronde") respectfully submits the following comments regarding NIGC's preliminary draft of proposed changes to the facility licensing regulations codified at 25 C.F.R. Part 559. Grand Ronde appreciates this opportunity to comment.

As one of two tribes that have earned a Certificate of Self Regulation, Grand Ronde has previously urged the Commission to exempt self-regulated tribes from the facility license regulations. Grand Ronde again urges the Commission to exempt self-regulated tribes from the regulations as we firmly believe that the facility license regulations impact one of the powers described in IGRA (25 U.S.C. § 2706(b)(1)-(4)) from which Congress specifically exempted self-regulated tribes.

This being said, Grand Ronde has reviewed the preliminary draft amendments to the facility license regulations and is pleased with the direction the Commission is taking with regards to the regulations. However, the preliminary draft does not indicate whether the Commission is proposing any modifications to the definition of "construction and maintenance of the gaming facility, and the operation of that gaming is conducted in a manner which adequately protects the environment and the public health and safety" which appears in 25 C.F.R. §502.22. The current definition contains language that has been removed from 25 C.F.R. §559.5 in the preliminary draft. Grand Ronde suggests that the current definition be eliminated or replaced with language recognizing that the tribes are in the best position to determine compliance with regard to environmental and public health and safety issues.

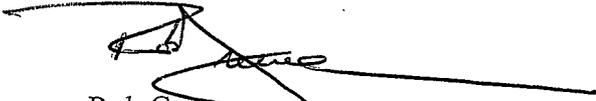
Thank you again for the opportunity to comment on NIGC's preliminary draft of proposed changes to the facility licensing regulations. Grand Ronde appreciates the Commission's efforts

Umpqua Molalla Rogue River Kalapuya Chasta

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in revising these and other NIGC regulations. Please contact me at (503) 879-2270 if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Rob Greene", with a long horizontal flourish extending to the right.

Rob Greene
Tribal Attorney

cc: Tribal Council
Grand Ronde Gaming Commission