



The Confederated Tribes of the Grand Ronde Community of Oregon

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May 31, 2011

Ms. Kathy Zebell
National Indian Gaming Commission
1441 L Street, NW, Suite 9100
Washington, DC 20005

*via electronic submission to
consultation.policy@nigc.gov*

Re: Draft NIGC Government-to-Government Tribal Consultation Policy

Dear Ms. Zebell:

The Confederated Tribes of the Grand Ronde Community of Oregon ("Grand Ronde") respectfully submits the following comments regarding the Draft NIGC Government-to-Government Tribal Consultation Policy ("Draft Consultation Policy") in response to NIGC's letter of March 8, 2011. Grand Ronde appreciates this opportunity to comment and commends NIGC's efforts to improve its policies on consultation and coordination with Indian tribes pursuant to Executive Order 13175 and the President's November 5, 2009 Executive Memorandum on Tribal Consultation with Indian Tribes.

As one of two tribes that have earned a Certificate of Self-Regulation, Grand Ronde has consistently urged NIGC to consult directly with self-regulated tribes on proposed regulations and guidelines, but to no avail. As such, Grand Ronde strongly recommends that the Draft Consultation Policy include a specific provision for consultation with self-regulated tribes. Such a provision would help ensure that NIGC gives full effect to IGRA's self-regulation provisions. The provision should require NIGC to consult with self-regulated tribes to determine whether a proposal for regulations or other action would impact one of the powers described in 25 U.S.C. § 2706(b)(1)-(4) from which Congress exempted self-regulated tribes, and if so, how the regulations or other action could be modified to address self-regulated tribes. The inclusion of a provision for self-regulated tribes in the Draft Consultation Policy would also be beneficial in demonstrating to other tribes the benefits of self-regulation.

Thank you again for the opportunity to comment on NIGC's Draft Consultation Policy. Meaningful consultation geared towards cooperative decision-making that acknowledges the interests of both NIGC and Grand Ronde is extremely important to Grand Ronde and we appreciate your efforts in this regard. Please contact me at (503) 879-2270 if you have any questions.

Very truly yours,



Rob Greene
Tribal Attorney

cc: Tribal Council
Grand Ronde Gaming Commission

Umpqua Molalla Rogue River Kalapuya Chasta