

DOI SELF-GOVERNANCE ADVISORY COMMITTEE

c/o Self-Governance Communication & Education Tribal Consortium
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August 21, 2018

The Honorable Ryan K. Zinke, Secretary
United States Department of the Interior
1849 C Street, NW
Washington, DC 20240

RE: Reinstatement of the Strategic Planning Subcommittee to Ensure the Department's Strategic Plan is More Reflective of the Tribal/Federal Partnership and Includes Measures that Align with the Government-to-Government Relationship

Dear Secretary Zinke:

On behalf of the Department of the Interior's Self-Governance Advisory Committee (DOI-SGAC), I write to strongly object to the Department's Strategic Plan (Plan) for Fiscal Years 2018-2022 and the unilateral process used to develop the Plan by the Department. Further I want to point out that it is fundamentally flawed because it fails to respect and honor the government-to-government relationship between the Federal Government and Tribal Nations and diminishes Tribal Self-Governance and Self-Determination. In addition, the goals, strategies and performance measures do not recognize Tribes as a priority and are not reflective of the Department's obligation to uphold the treaty and trust responsibility to Tribes.

Despite numerous requests and attempts from Tribes to provide information and input to assist the Department in shaping the Strategic Plan's mission, goals and objectives, the Department essentially ignored the Tribes and, as a result, developed a Plan that not only does not align with the Department's fundamental responsibilities to Tribes but that in some instances is downright offensive to Tribes. For example, under *Mission Area 4 Fulfilling Our Trust and Insular Responsibilities, Goal 2 Fulfill Fiduciary Trust*, the language in the Plan speaks to reducing Tribal dependency on Federally-subsidized programs, such as, childcare, food stamps and welfare. To be clear, the trust obligation is not a social welfare program; it is a promise between Nations to provide programs and services in perpetuity in exchange for the vast lands and resources Tribes provided to the United States.

The Federal government's perpetual failure to honor its promises to fully fund Tribal programs and services does not alleviate its responsibility to fulfill that promise nor does it transfer the obligation to Tribal governments. Yet, the Plan seems to suggest just that and what is most blatantly obvious is that the Plan fails to include any mission areas, goals and objectives that illustrate how the Federal government intends to uphold its treaty and trust obligations by fully funding Tribal programs and services. Government Program Rating Assessment measures do not fit the government-to-government context – new measures need to be created. It is striking that the Office of Insular Affairs is more attuned to the principles of Self-Governance and strengthening the capacity of Nations through strategic investments and the provision of technical assistance as opposed to the Department's goals

for Tribes that speak to oversight and reducing Federal dependency from a “social welfare” context.

We urge the Department to reinstate the Strategic Planning Subcommittee whose members include, Tribal representatives and Indian Affairs performance, budget and program staff. The Subcommittee will ensure that the next iteration of the Plan is more reflective of the Tribal/Federal partnership and includes goals, strategies and performance measures that align with the government-to-government relationship. Tribes should be a priority and the provisions and language used throughout the Plan must recognize Tribes as governments and respect their sovereign status by not relegating them to a status that is either on the same level as constituents and/or other stakeholders or that references Tribes as an afterthought. We need to know who is responsible for developing the Plan and engage with them on a regular and meaningful basis.

We look forward to further discussions with you as we work towards achieving comprehensive resolutions. If you have any questions, please do not hesitate to contact me at (206) 369-6699 or via email at rallen@jamestowntribe.org.

Sincerely,



W. Ron Allen, Tribal Chairman/CEO, Jamestown S’Klallam Tribe
and Chairman of the Self-Governance Advisory Committee (SGAC)

cc: The Honorable Tara Mac Lean Sweeney, Assistant Secretary Indian Affairs
John Tahsuda III, Principal Deputy Assistant Secretary – Indian Affairs
Eugenia Tyner-Dawson, Senior Policy Advisor to Assistant Secretary – Indian Affairs
Sharee Freeman, Director, Office of Self-Governance
Ken Reinfeld, Senior Policy Analyst, Office of Self-Governance
DOI Self-Governance Tribes
SGAC Members and Technical Workgroup