July 14, 2017

U.S. Department of the Interior
Bureau of Indian Affairs
ATTN: Michael S. Black, Acting Assistant Secretary
Washington, DC 20240

RE: Tribal comments on Department and Bureau implementation of Executive Order 13781: Reorganization of the Executive Branch

Assistant Secretary Black:

On behalf of the Confederated Tribes of the Grand Ronde Community of Oregon ("Grand Ronde" or "Tribe"), thank you for the opportunity to comment on Executive Order (EO) 13781: Reorganization of the Executive Branch. Grand Ronde is made up of over 27 antecedent tribes and bands from western Oregon, southwest Washington, and northern California. The Grand Ronde Indian Reservation is located in northwest Oregon. The Tribe and its members rely on services from the Department of the Interior (DOI) and its agencies including the Bureau of Indian Affairs (BIA) for their well-being and the well-being of the lands, natural resources and cultural resources on the Reservation and ancestral homelands of the Tribe.

The Tribe strongly encourages the DOI and BIA to remember their federal trust responsibilities to Grand Ronde and its people and to consider the effects of reorganizing and/or "downsizing" the agencies. The National Congress of American Indians (NCAI) has expressed concern regarding FY18 federal budget cuts that would affect services to the nation’s federally-recognized tribes, and has formally requested ongoing government-to-government consultation on any proposed cuts to funding that would affect American Indians and Alaska Natives. Please see NCAI Resolution MOH-17-051.

In a similar spirit, Grand Ronde expresses concern regarding any agency reorganization that would potentially affect the well-being of the Tribe, its members, or its lands and resources both on- and off-Reservation. The Tribe defines consultation as an equal dialogue between sovereign nations or their agencies at the highest levels of decision-making. Consultation is an ongoing and meaningful dialogue; this means that consultation takes place until project completion, not just until the comment window is over. Therefore, the Tribe requests ongoing government-to-government consultation on any and all DOI and BIA plans and proposals regarding agency reorganization, as well as their implementation.
Please contact Michael Karnosh, Ceded Lands Program Manager, at (503) 879-2383 or Michael.Karnosh@grandronde.org if there are any questions on these comments. Once again, thank you for this opportunity to comment.

hayu-masi (Many thanks),

David Fullerton
General Manager

Cc: Tribal Council