



July 14, 2017

Secretary Ryan Zinke, Department of the Interior
Michael S. Black, Acting Assistant Secretary – Indian Affairs
consultation@bia.gov

RE: Reorganization of Dept. of the Interior pursuant to E.O. 13871

Honorable Secretary Zinke:

On behalf of the Pueblo of Laguna, New Mexico, kindly accept our comments related to reorganization of the Department of the Interior (DOI) as requested the “Dear Tribal Leader Letter” sent by Michael Black on May 16, 2017.

Generally, no one at the Pueblo can recall any prior reorganization effort for the Bureau of Indian Affairs (BIA) ever resulting in significant positive results for Indian Programs. Rather, we can only recall the opposite result – diminished budgets and adverse impact on tribes by reducing financial assistance or services. Hence, although admittedly there is a fair amount of redundancy throughout the federal government, we doubt that this current effort will yield noticeable improvements that benefit our Pueblo or Indian Country. Nevertheless, we ask you to keep in mind that the effort should, at least, do no harm.

We recognize, for example, that it could initially look logical to move the functions of the Bureau of Indian Education to the Department of Education, or BIA forestry to Department of Agriculture, or BIA transportation to Department of Transportation. However, before serious consideration to any of these ideas there must be an appreciation for the reason that an education, forestry, or transportation function currently exists within the DOI and BIA.

These and many other similar functions exist within the BIA primarily because of the trust responsibility of the United States due to Indians and the historical lack of such functions being adequately addressed by the “logical” department in the first place. For the most part, the various federal departments exist to serve the states. And, for the large part of United States history, the states have regarded the tribes within their respective borders to either be, at worst, a threat, or, at a minimum, an irrelevant constituency. Given these circumstances, there has been for the most part a lack of interest by the “logical” department to devote comparable resources to address Indian Country needs. BIA has needed to advocate for tribes and take care of issues not otherwise addressed.

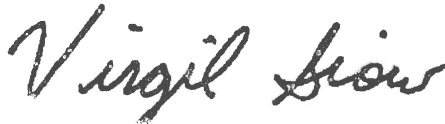
Another “logical” consolidation is to transfer any BIA housing function to the Department of Housing and Urban Development (HUD). However, HUD is but one example of the previously-noted continuing neglect of Indian Country issues by the “logical” federal agency.

HUD has not in the previous ten years (and probably longer) sought Indian Housing Block Grant (IHBG) program funding in parity with general public housing funding. On a per household basis, HUD seeks IHBG funding that is only 45% of public housing funding. For example, the \$598 million allocated under the proposed FY 2018 federal budget for the IHBG program will provide assistance to approximately 317,000 low-income Indian families – or only \$1,886 per household. On the other hand, the same budget provides \$4.528 billion for public housing programs to assist 1.1 million public housing units or families – or a more robust \$4,116 per household. It is this regular funding disparity that provides impetus for the DOI and BIA to seek separate housing funds from Congress for Indian-specific programs within the BIA.

All of the current programs within the BIA exist primarily because the “logical” federal agency could not or would not address the Indian Country issue. Hence, absent BIA taking on functions that logically could be, but were not being, delivered to Indian Country by other federal agencies, those issues would continually be neglected. BIA has been the primary advocate for addressing Indian Country needs and issues for several decades. Neither DOI nor Pueblo of Laguna can point to sufficient improvements in any other federal agency’s services to our people to justify any diminishment in BIA resources or functions. That is why we urge caution in considering reorganization to achieve efficiency. Kindly remember the necessity of having apparently duplicative services delivered by the BIA to Indian Country, and do no harm.

Respectfully,

PUEBLO OF LAGUNA

A handwritten signature in black ink that reads "Virgil Siow". The signature is written in a cursive, flowing style.

Virgil A. Siow, Governor