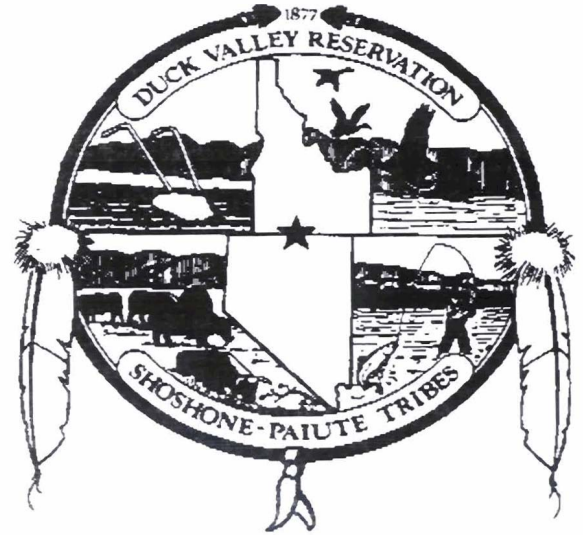


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March 11, 2007

Nancy Theodore  
USDA, Food and Nutrition Service  
Food Distribution Division  
3101 Park Center Drive, Room 506  
Alexandria, Virginia 22302

**RE: NEW METHODOLOGY TO FUND FDPIR**

Dear Funding Methodology Work Group:

I would like to personally say thank you to those members of the FDPIR funding methodology workgroup for making an effort to find a fair approach to distributing funds for food distribution programs.

**BACKGROUND**

The Duck Valley Indian Reservation is home to the Shoshone-Paiute Tribes, with an enrollment of 1,945 members. The population of this remote community, which is bordered by the states of Idaho and Nevada, is approximately 1,500 residents and has a land base of 289,000 acres. The rural community is largely a ranching community; yet, the largest employer is the Shoshone-Paiute Tribes' government, which is governed by the Business Council Chairman and six Council Members, which are elected positions with three year staggered terms.

**POVERTY**

The rural and remote region where this community exists has historically been a depressed region of America. Specifically, those individuals who live below the poverty line as defined by HHS Poverty Guidelines is around 170 individuals. Nearly 100% of the children who are enrolled at Owyhee Combined Schools receive free or reduced lunches. Those children who are ages 0-21 who are enrolled in Medicaid are 451, reservation wide.

In the next few years, the community is expecting to see an increase in electricity rates, estimated to be as high as 20% over the next two years. There are multiple factors that increase the need for a food distribution program. Winter months can be harsh, limiting the ability to commute to off reservation employment with the mileage at or exceeding 100 miles to the nearest town off the reservation. Many of the tribes' traditional people who speak about the removal from aboriginal territory to the present reservation note that a significant amount of resources for

subsistence was fish, deer, and elk, all of which have been impacted by hydroelectric development and over all decrease in natural populations.

## **PRELIMINARY FUNDING METHODOLOGY PROPOSAL**

At this point, the Shoshone-Paiute Tribes cannot support the proposal found in attachment C. For over a decade the Tribes have been involved in Self-Governance, which to date has over 300 tribes participating in various degrees nationwide. Each tribe is involved in negotiations with the Department of Interior, Bureau of Indian Affairs and Indian Health Services to negotiate annual funding agreements to a point of satisfaction.

Because of our extensive previous experience working with formulas and funding agreements, we find it hard to believe that the USDA finds working with the tribes too time-consuming. Based on the information received from the USDA, the Shoshone-Paiute Tribes will respectfully require the agency to engage in government-to-government consultation for the purposes of discussing this issue within in a context that has meaning to the Shoshone-Paiute Tribes. Though we do not discredit the efforts of Funding Methodology Work Group, we do not recognize the group as a spokesman for the Tribes or for the USDA. We simply see the group setting forth a plan which is now the responsibility of the USDA to work government-to-government to either implement pieces of the plan that works or develop a truly equitable, efficient proposal that meets the basic needs of ALL tribal governments.

The current situation of our food distribution program is already operating at a bare minimum. The reservation residents who are in the greatest need are already impacted by an under funded USDA FDPIR. As demonstrated in the background section, this community is a small tribe with less resources then one might find at a larger community. Our user numbers should be an indication of the isolation and remoteness, which prohibits people working away from the community during harsh winter months.

## **CONCLUSION**

The Tribes understand that resources are scarce and limited. This tribe has particularly felt the impacts and struggles with keeping a warehouse operational. The director of the Shoshone-Paiute Tribes program has been innovative in partnering with local agencies to serve our people well. We appreciate the opportunity to comment and we will support the USDA in working out a solution to ensuring that all the tribes, large and small, are treated equally and respectfully.

Respectfully Submitted,

KYLE R. PRIOR  
Chairman