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THE SAN CARLOS APACHE TRIBE

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Wendsler Nosie, Sr.
Tribal Chairman



David Reede
Vice Chairman

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

Re: Response to comments on FDPIR Funding Methodology

Dear Ms. Theodore:

On behalf of the San Carlos Apache Tribe I appreciate the opportunity to provide our response to the proposed administrative funding methodology that will impact our tribe's Food Distribution Program, as well as many similar tribal programs throughout our country. While the San Carlos Apache Tribe appreciates the diligent work that went into the development of this proposed funding formula we offer the following comments and recommendations that we request be considered and or factored into the final proposal.

First, we agree with prior comments that the proposed changes are too vague. Not being able to determine possible consequences or impacts of the proposed changes is in our opinion imprudent. It would make far more sense to develop scenarios using what is known and allow thorough investigation of specific actions and possible impacts to our programs. Perhaps conducting *Pilot Studies* or *Feasibility Studies* may be necessary to address any possible unforeseen consequences.

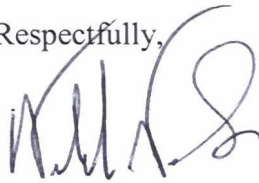
This additional effort at due diligence may help alleviate some skepticism and/or reservations about unintended consequences. Certainly, any changes that could, in the long-term, possibly detrimentally impact the services we provide to our communities requires a higher degree of due diligence.

Although we appreciate efforts to implement fairness and equity of allocations to the extent of providing a base amount in Component 1 of \$10,000 in consideration of smaller

tribes we feel this is an arbitrary amount that does not accurately reflect the *needs* of individual programs. We agree with other comments that have been provided at various 'listening sessions' that this 'one size fits all' approach does not work in Indian Country. Component 1 under the base amount would not work for larger tribes that also have significant land bases. Our reservation encompasses nearly 2 million acres that is divided into four districts. One district is remotely located and our food distribution program commutes to this district twice a month to provide services to families residing in that particular district. Providing 'fairness' to smaller tribes in Component 1 appears to come at the expense of 'unfairness' to larger tribes. There has to a more balanced approach.

Obviously, any changes that could impose restrictions in the long-term for our program to operate efficiently will be opposed by tribes. We also agree that the Working Group needs to involve more of the larger tribes for fairer representation. In an economy of diminishing resources it is imperative that consultation be adequately afforded to tribes as we work together at maximizing our existing resources. Therefore, we look forward to further opportunities where tribal input will be valued as we work in unison towards a common ground to improve existing administrative funding allocations.

Respectfully,

A handwritten signature in black ink, appearing to read 'W. Nosie', with a large, stylized flourish at the end.

Wendsler Nosie, Sr.
Tribal Chairman
San Carlos Apache Tribe