

Cocopah Indian Housing and Development

Michael L. Reed, PhD.
Chief Executive Officer

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January 27, 2010

Deborah M. Lalancette
Director, Office of Grants Management
U.S. Department of Housing and Urban Development
Program Office of Native American Programs
1670 Broadway, 23rd Floor
Denver, CO 80202

Dear Ms. Lalancette;

This letter is in response to the recent review or consultation meeting held in Scottsdale, Arizona on January 25, 2010. I will indicate suggestions by following the Federal Register (Vol. 66, No. 189/Friday, September 28, 2001 / Notice.). Before I start, I would like to comment on the short notice of the meeting on January 25, 2010.

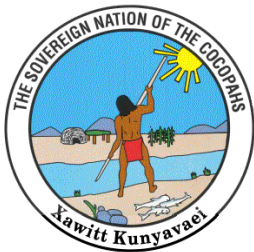
Tribal leaders are extremely busy and need considerable more time to arrange to meet with your agency than a couple of days. At minimum, thirty days might be sufficient notice. If the leader cannot attend, an official may be appointed within this timeframe. Also, Tribes conduct business with a number of federal agencies. Consulting with all of them could be very time consuming and expensive under this type of consultation framework.

Section II Definitions

“... duly appointed officials...” **Does this mean Chief Executive Officers and Executive Directors of entities (TDHE) providing services through HUD Grants?**

Section III Principles

D. “HUD shall take appropriate steps to remove existing legal and programmatic....” **The word programmatic should be changed to problematic.**



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Section IV. Tribal Coordination, Collaboration and Consultation

A. "Tribal Coordination, Collaboration and Consultation apply when... identified by HUD...as having a substantial direct effect on an Indian tribe." **Tribes must be consulted before making this decision. It must be a joint decision, not a unilateral decision by HUD.**

C-1. Headquarters – "HUD will consult with existing national organizations." **This is not realistic. Current national organizations like the National American Indian Housing Council (NAIHC) are not in a position to provide advice and recommendations on positions of tribes throughout the United States, and Alaska. For example, many tribes do not participate in meetings, conferences, or training sessions offered by NAIHC.**

Many of the organizations HUD may rely on are managed by large tribal, housing leaders who do not share the same problems or concerns as small and medium size tribes. Tribes in Alaska are very different in their needs compared to tribes in the lower 48 states.

D. Joint Federal/Tribal Work Groups or task Forces. **How often will HUD select and change the group? My recommendation is biennial.**

Thank you for the opportunity to comment. Given more time, additional analysis might have brought forth more additional comments.

Sincerely,

Michael Reed, Ph.D.
Chief Executive Officer

cc Carolyn O'Neil, Administrator