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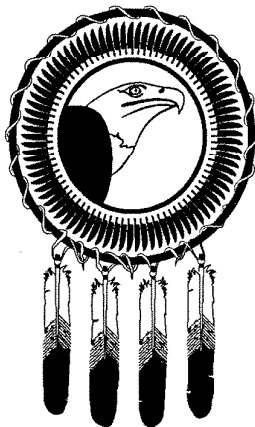
*Maximizing the Impact of the Restoration Fund: Policies the White
Mountain Apache Tribe Can Use to Manage the 22-H Fund*

by

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EXECUTIVE SUMMARY

This report has been prepared at the request of the White Mountain Apache Tribe ("WMAT" or the "Tribe"). The Tribe has recently won a settlement in the amount of \$22 million, \$4.4 million of which it has set aside to establish a permanent tribal fund (the "Fund"). The settlement originated from a lawsuit which charged the federal government with mismanaging the Tribe's natural resources. Because the money was won as compensation for damages to the land, the tribal government has decided that it must be returned to the land. Therefore, the interest on the permanent fund will support projects which restore the land, promote education in natural resources, and strengthen cultural programs related to the land.

The interest income on the \$4.4 million restoration fund will range from approximately \$250,000 to \$400,000 per year. *This is not a large sum of money* to fund projects that collectively benefit the Tribe. To endow the Fund with practical as well as symbolic value, tribal leaders must think strategically about how to manage the Fund so as to maximize its impact, or get the most "bang for the buck." This report responds to this policy challenge by presenting the following key tasks:

- **Define the mission of the Fund**
- **Create institutions to manage the Fund**
- **Build the finances of the Fund**

To address these tasks, the Tribal Council should pass an ordinance which establishes the Fund and sets guidelines for its administration. Because ordinances involve a public comment process, adopting one will assist in building legitimacy and support for the Fund. The ordinance should include the following recommendations:

Define and build support for the mission of the Fund. The Tribe must take this step to ensure that tribal members feel invested in the success of the Fund. Defining a mission is a task which any organization must accomplish in order to function effectively. For the White Mountain Apaches, however, it is also necessary because of more specific reasons: the existing

confusion over the goals of the Fund, the need to insulate the Fund from politics, and the potential for overlap with other programs. The process of defining the mission of the Fund should involve an open dialogue in which tribal leaders and managers educate tribal members about the Fund, while eliciting input and support for its mission.

Create a Board of Directors to oversee the Fund. A Board of Directors will serve as an oversight body to ensure that the uses of the Fund remain consistent with its mission and that the Fund continues to grow financially. Not only will the Board set broad policies for the Fund, but it will also create a buffer which will help insulate the Fund from tribal politics and contribute to the Fund's legitimacy in the eyes of both tribal members and outside funders. In establishing a Board of Directors, the tribal government must determine its size and composition, the selection process by which members are chosen, and the appropriate term length and structure for members.

Found a non-profit institute to manage the daily operations of the Fund. The Tribe should charter a non-profit institute to oversee restoration projects and coordinate them among different departments, thus acting as a centralized "brain." This institute will provide a place to gather knowledge and draw expertise together, as well as offer work and learning opportunities for young tribal members pursuing careers in natural resources management. By educating tribal members to take care of their land, this institute will establish and elevate the importance of land restoration among tribal members. In addition to giving the Fund symbolic importance, the institute will attract attention and funding from outside sources and help insulate the Fund from tribal and constituent politics.

Build the Fund through investment strategies and outside funding. To increase the size of the Fund and thus maximize its impact, the tribal government should adopt a dual approach which involves pursuing savvy investment strategies and seeking additional funding from outside sources. Recommended investment strategies include: placing the Fund in a restricted account for at least one year, reinvesting a portion of the interest each year to protect the principal, and diversifying the asset portfolio to reduce the overall riskiness of the investments. By seeking additional funding from outside sources, the tribal government can leverage the interest earned on the principal of the Fund, as well as expand the endowment.

This task will require establishing a grant-writing role within the managing structure of the Fund. This report discusses sources of possible funding and provides information on researching additional sources.

RECOMMENDATIONS

- **Define and build support for the mission of the Fund**
- **Create a Board of Directors to oversee the Fund**
- **Found a non-profit institute to manage the daily operations of the Fund**
- **Build the Fund through investment strategies and outside funding**

Despite the relatively small size of the land restoration fund, the tribal government has the opportunity to expand its impact by making sound strategic decisions. Because the decisions summarized in our recommendations may involve some risk, tribal leaders must ask themselves whether restoring the land is worth assuming this risk. We believe that it is. Only by taking a bold, clear step, such as founding an institute, can tribal leaders instill the importance of land restoration in the minds of tribal and community members. In all likelihood, choosing a low-risk strategy will not bring about the structural changes which are necessary to restore the land and the people's relationship to the land--and may even risk accusations of money mismanagement (as in a previously administered fund in the 1970's).

The land restoration fund presents the Tribe with an opportunity as well as a challenge to develop a long term vision for the management of tribal resources. This vision will involve healing the land and reconnecting the people to the land. While the Tribe's ties to the land stem from a traditional reverence for Mother Earth, this respect and knowledge are in danger of being lost as younger generations become increasingly detached from their natural environment. By learning to take care of the land, tribal members will contribute to their own economic, physical and spiritual well-being, as well as to the self-sufficiency of the Tribe as a whole.

INTRODUCTION

PURPOSE OF THE REPORT

This report has been prepared at the request of the White Mountain Apache Tribe ("WMAT" or the "Tribe"). The Tribe has recently won a settlement in the amount of \$22 million, \$4.4 million of which it has set aside to establish a permanent tribal fund (the "Fund"). The settlement originated from a lawsuit which charged the federal government with mismanaging the Tribe's natural resources. Because the money was won as compensation for damages to the land, the tribal government has decided that it must be returned to the land. Therefore, the interest on the permanent fund will support projects which restore the land, promote education in natural resources, and strengthen cultural programs related to the land.

The interest income on the \$4.4 million restoration fund will range from approximately \$250,000 to \$400,000 per year. *This is not a large sum of money to fund projects that collectively benefit the Tribe.* To endow the Fund with practical as well as symbolic value, tribal leaders must think strategically about how to manage the Fund so as to maximize its impact, or get the most "bang for the buck." This report responds to this policy challenge by presenting the following key tasks:

- **Define the mission of the Fund**
- **Create institutions to manage the Fund**
- **Build the finances of the Fund**

To ensure that tribal members feel invested in the success of the Fund, the tribal government should define and build support for the mission of the Fund through a process of open dialogue among tribal leaders, members and the managers of the Fund. To administer the Fund effectively, the tribal government should create sound institutions which will pursue the mission of the Fund and insulate the Fund from politics. Finally, to maximize the impact of the Fund, the tribal government should pursue financial strategies which will expand the endowment as well as the interest income of the Fund.

This report presents recommendations which address the three key tasks outlined above. The Tribal Council should pass an ordinance which includes these recommendations, thereby establishing formal policies and shielding the Fund from arbitrary management. In providing these recommendations, this report aims to strengthen the self-sufficiency of the White Mountain Apaches by assisting them in managing and developing their resources in a sustainable manner.

ROAD MAP FOR THE REPORT

Background: The background section contains relevant history of the settlement and how the Fund came into existence. This section also provides a brief profile of the White Mountain Apaches, including demographic statistics, the geography of the reservation, and a discussion of relevant cultural values.

Mission of the Fund: This section explains the importance of defining the mission of the Fund, discusses some elements which may contribute to the mission, and provides suggestions on how to define and build support for the mission of the Fund.

Managing the Fund: This section proposes several steps which the tribal government should take to successfully administer the Fund:

1. Create an oversight body for the Fund
2. Choose a management structure for the Fund
3. Identify criteria for selecting projects
4. Establish measures of accountability

Building the Fund: This section provides recommendations on how to increase the size of the Fund. The section includes possible investment strategies and suggestions for seeking additional funding from outside sources.

Conclusion: The conclusion reminds tribal leaders of the important decisions they must make in managing the Fund and summarizes the options which they should consider when making these decisions.

BACKGROUND

This section provides the history of the settlement which led to the creation of the White Mountain Apache Tribe's land restoration fund. The section also provides some background information on the Tribe, including demographic statistics and cultural values, which inform the need for the Tribe to manage its resources wisely.

HISTORY OF THE LAND SETTLEMENT

In 1951 the White Mountain Apache Tribe filed a lawsuit against the United States government for the wrongful taking of the Tribe's aboriginal lands in Arizona. As part of the same lawsuit, the Tribe also charged the federal government with committing the following injuries during the period 1871-1946:

- mismanagement of the Tribe's forest and timberlands
- overgrazing caused by non-Indian owned horses, sheep, and cattle
- damages due to the failure to develop water rights for the Tribe
- loss of tribal farming lands
- misuse of federal monies allocated to the Tribe

In 1972 the aboriginal land claims portion of the lawsuit was settled in "Docket 22-D" which awarded \$12 million to the White Mountain Apache Tribe. As part of this settlement, the tribal government agreed to abide by a federal law requiring that it retain at least 20 percent of the settlement money for tribal use. The tribal government decided to distribute 80 percent of the settlement to all tribal members on a per capita basis and to place the remaining 20 percent of the settlement money in a general fund earmarked for youth recreation programs.

After the 22-D portion of the case was settled, the Tribe continued to prosecute its claims against the United States government for the mismanagement of its resources. In 1992 the United States Claims Court granted in "Docket 22-H" a settlement of \$14.38 million to the White Mountain Apaches to compensate them for the grievances listed above. However, the

Tribe's attorney filed an appeal, asserting that interest be included in the final award. In December 1995 the tribal government resolved this issue by reaching an agreement with the Department of Justice awarding funds which totaled \$22.12 million.

As part of this settlement with the federal government, the tribal government again agreed to set aside 20 percent of the settlement money for collective purposes. In 1995 the Tribal Council passed a resolution which decreed that 80 percent of the 22-H money be distributed on a per capita basis among tribal members and that the remaining 20 percent be used to establish a permanent tribal fund, of which only the interest payments would fund projects. This resolution stated that the Fund would be devoted to three goals: restoring the land, promoting education in natural resources, and strengthening cultural programs related to the land.

Lessons from the 22-D Fund

While providing youth recreational programs was a worthy objective, the 22-D fund was administered in a way that did not build in mechanisms for accountability. For example, the tribal government did not select projects according to specified criteria or include an evaluation process for the projects. As a result, the money was exhausted with few long-term benefits to show for it. Due to publicly held perceptions that the 22-D fund was mismanaged and that politics may have influenced its administration, a considerable amount of skepticism has resulted, leaving a residue which still shapes how some tribal members view tribal government.

Still, the Tribe's experiences with the 22-D fund represent a learning opportunity as well as the impetus to build public support for the policies overseeing the 22-H fund. The tribal government has learned that it must build accountability into the administration of the Fund while minimizing the amount of political influence over its use. Another lesson is the need to foster legitimacy in the eyes of tribal members by involving them in the Fund's mission. Finally, the tribal government has learned that it must establish realistic expectations by educating tribal members about the limitations of the Fund, in order to prevent misunderstandings and dissatisfaction over its use.

THE WHITE MOUNTAIN APACHES

At a Glance

The White Mountain Apache Tribe is one of nine Apache tribes located in the Southwest. The population of the Tribe is roughly 12,000 and is growing at a rapid rate of 3.3 percent per year. Approximately 51.0 percent of the population is 18 years of age or younger. As of 1996, the high school graduation rate was 48.3 percent and the proportion of tribal members with college degrees was 1.3 percent. The latest measure of the unemployment rate was 13.7 percent, but may not include those who are not actively seeking employment.¹ The territory of the White Mountain Apaches, like those of other American Indian tribes, has been reduced over the years (the current boundaries of the Fort Apache reservation were established by executive order in 1871), but the Tribe still retains sole possession of 1.6 million acres. The White Mountain Apaches do not see their reservation as mere territory, but as sacred land to which they have a close connection.

Fort Apache Reservation

The White Mountain Apache Tribe's land is rich in natural beauty and resources and is all comprised of aboriginal territory. Approximately a three-hour drive east of Phoenix, the reservation begins in the desert, but soon leaves it behind as it climbs from an altitude of 2,700 feet in the southwest corner to 11,590 feet in the northeast corner. The reservation is 75 miles long and 45 miles wide, with 25 fishing lakes, and over 420 miles of rivers and streams. The land is rich in timber, mineral, wildlife, and water and constitutes some of the most valuable land in Arizona. According to the Winters Doctrine the WMAT has senior rights to the reservation's surface water, extremely valuable given the dependence of the Phoenix metropolitan area on the surface runoff from the reservation.² The reservation's natural resources have enabled the Tribe to attract hundreds of tourists each year and to establish

¹ Statistics provided by the White Mountain Apache Tribal Planning Department, April 1996

² *Winters vs. United States*, 207 U.S. 564 (1908)

successful tribal enterprises such as the Sunrise Ski Resort, the Fort Apache Timber Company (FATCO) and the Tribal Game and Fish department.

The reservation is divided into four political districts with population centers in Cibecue, Cedar Creek/Carrizo, Whiteriver, and East Fork/Fort Apache. Most reservation residents agree that these communities differ in the degree to which they have retained traditional cultural practices. They also vary in the degree to which they are politically active and organized, and in the level of environmental damage which their land has suffered over the years. Tribal leaders will need to take into account these differences when making choices concerning the allocation of the 22-H fund revenues.

Cultural Values

The cultural values of the Tribe are one of its greatest strengths, but also pose a potential challenge. One important cultural value is the Apaches' deep and abiding respect for their land. This respect for the land has a spiritual as well as pragmatic side to it: the White Mountain Apaches believe that the land is sacred, and that the health of the land is inextricably linked to the health of the people. Not only does the land represent their livelihood (and thus their economic and physical well-being), but it is also intimately tied to the White Mountain Apaches' identity as a people. This cultural value is rooted in centuries of accumulated knowledge and practices relating to the land and its healing powers.

Another important cultural value is the expectation that wealth should not be accumulated but should be shared among friends and kin. This value reflects the strong social ties among tribal members; however, it may also encourage constituents to pressure tribal leaders for individual assistance. Because this norm can make it difficult for tribal leaders to turn down such requests, it can lead to the arbitrary use of funds. This particular cultural value therefore presents a potential challenge for the Tribe.

This report seeks to assist the tribal government in leveraging both of these cultural values when managing the restoration fund. The Apaches' traditional knowledge and respect for the land can provide the will to restore the land, as well as complement the more technical

efforts at land restoration. In addition, the tribal government can use the cultural norm of sharing wealth to shape the perception of the Fund as a means of sharing wealth among present and future generations of Apaches. Both of these cultural values highlight the importance of defining and building support for the mission of the Fund, which is discussed in the following section.

THE MISSION OF THE FUND

To administer the restoration fund effectively, the White Mountain Apache leaders, managers and members must share a common vision for the Fund. This section addresses the following questions:

- **Why is it necessary to define the mission of the Fund?**
- **What are some elements which may be included in the mission?**
- **How can the Tribe define and build support for the mission?**

WHY DEFINE THE MISSION OF THE FUND?

Defining a mission is a task which any organization must accomplish in order to function effectively. A clear mission enables an organization to motivate people around a common vision and to ensure that they are pursuing the same objectives, especially when the mission is defined through a consensus-building process. The mission also ensures that progress is measured in the context of the big picture rather than lost in the details. For the White Mountain Apache Tribe, defining the mission of the land restoration fund is also an important task for the following, more specific reasons:

Confusion over the goals of the Fund: Currently, there exists some confusion over the three goals of the Fund--land restoration, educational advancement, and cultural maintenance--and how they relate to each other. This confusion stems from disagreement over how the goals should be defined, and whether any particular goal should receive more attention and funding. Questions that have arisen include, "Should the Fund provide scholarships to students pursuing all types of education, or only to those pursuing careers in natural resources management?" and "Does 'cultural maintenance' mean preserving the language, or does it connote a broader meaning?" Many tribal members disagree on the answers to such questions, which reflects the need to define a clear mission for the Fund.

The need to insulate the Fund from politics: Given the current confusion over the goals of the Fund, unless the tribal government draws the community together around a common vision, misunderstandings and complaints will inevitably arise over how the Fund is managed. This risk is particularly salient given the history of the 22-D fund and the resulting cynicism voiced by some tribal members. By defining the mission of the Fund and establishing realistic expectations, the tribal government can make a preemptive move to discourage individual requests for assistance made by tribal members. Alleviating the pressure on tribal leaders to respond to such requests will help insulate the Fund from politics.

Potential for overlap with other programs: Because the tribal government already manages several programs which seek to restore the land, provide scholarships and promote the Tribe's cultural heritage, it is especially important to clarify the mission of this particular fund to avoid any duplication of efforts in managing the Fund. By distinguishing this fund from other existing programs through its mission statement, tribal members can remind themselves of the opportunity to accomplish something new and special with this fund. The Tribe can thereby increase the impact of the fund in a meaningful and visible way.

WHAT ARE SOME ELEMENTS OF THE MISSION ?

The task of defining a mission should involve a consensus-building process which enables people to feel invested in the success of the program. A mission is most effective and powerful not when leaders force it on others, but when they build support and legitimacy from as many people as possible. This portion of the paper is therefore meant to provoke thought about the possible elements of the mission, rather than to define it categorically for the Tribe.

Restoring the Land and the People's Relationship to the Land

One theme which emerged during our interview process is that the health of the people and the health of the land are interdependent, a belief expressed in the Apache proverb, "Take care of the earth, and the earth takes care of you." The changes which have occurred over the last century have damaged not only the land, but also the people's sense of identity as a tribe

which has traditionally respected and relied upon the land for its well-being. For example, the increasing detachment from the land may have heightened an ethos of hopelessness and dependency among tribal members which may have contributed to social problems such as alcoholism and juvenile crime. Thus an important element of the mission of the Fund is to restore both the land and the people's relationship with the land. The following discussion of the goals of the Fund expands upon this core concept.

Goals of the Fund

In passing the resolution authorizing the 22-H fund, the Tribal Council stated that the Fund would attempt to restore the land by pursuing the following three goals:

- **Direct land restoration**
- **Education in natural resources**
- **Cultural programs related to the land**

Direct land restoration: This goal seeks to address environmental damages on the reservation such as soil erosion, loss of native plant and animal species, encroachment of non-native species, and the destruction of riparian areas (lands adjacent to bodies of water). Restoring the land will require a great deal of technical expertise and knowledge in areas such as hydrology, soil science, geology, and watershed planning. Because most tribal members currently lack such expertise, the tribal government will need to draw upon the skills of non-tribal members in restoring the land. However, as part of the task of healing the people's relationship to the land, the Tribe must train its members to assume future positions of responsibility in restoring and managing their natural resources.

Education in natural resources: This goal involves preparing tribal members for careers in natural resources management. By encouraging students to pursue such careers, the Tribe can create opportunities for its youth while meeting tribal needs which currently go unmet or are filled by non-tribal members. One way to do so is to provide scholarships to students pursuing college or graduate degrees in natural resource management. Another way

is to cultivate programs which incorporate restoration projects into the curricula of the various schools on the reservation. For example, the Cibecue community has initiated a project in which young students will help gather environmental data contributing to land restoration. Teaching tribal members about the land will not only ensure its proper management, but will also contribute to making young students productive members of the Tribe.

Cultural programs related to the land: Although maintaining the tribal culture is a legitimate goal in and of itself, it also serves as the glue which binds the people to the land. The Tribe can contribute to restoring the land and its relationship with the people by reinvigorating the cultural knowledge and traditions surrounding the land. This process includes the restoration of Apache place names, the knowledge of healing plants and herbs, the sacredness of places, the Tribe's history and the stories that convey the meaning and wisdom of places. By drawing upon this traditional knowledge, the Tribe can complement and inform the more scientific and technical efforts to restore the land, as well as strengthen pride in its cultural heritage.

The three goals for which the Tribal Council approved the Fund--land restoration, educational advancement, and cultural maintenance--must be pursued as related goals rather than as disparate purposes. The task is not to restore the land simply for the health of the land, nor to promote education merely to provide employment, nor to restore the Tribe's culture just for the sake of preservation. Instead, the Tribe must promote a living relationship between the land and the people which is bound by its culture. Doing so will ensure the wise management of the land as well as the personal development of the tribal members.

HOW TO DEFINE AND BUILD SUPPORT FOR THE MISSION

To build the legitimacy of the Fund and enable tribal members to feel a sense of ownership and personal investment in its success, the Tribe must define and build support for the mission of the Fund through a consensus-building process. People are more likely to support a mission statement when they have participated in authoring it. Participants in this

process should include the Tribal Council, informal community liaisons and activists, and other interested tribal members.

The vehicles for defining and building support for the Fund's mission include a **formal public relations campaign** as well as more **personal outreach efforts**, both of which should involve the **use of the Apache language**. Some arguments which the tribal government can use to build support for the mission of the Fund are that it:

- Provides opportunities for tribal youth
- Promotes the economic health of the Tribe
- Strengthens the Tribe's sovereignty

Mechanisms for Defining and Building Support for the Mission

Formal public relations campaign: A formal public relations campaign will inform tribal members of the need to define a mission for the Fund and encourage their participation in this effort. The tribal government can employ various media to carry out a public relations campaign, including the Apache radio, the Apache Scout newspaper, road signs, television and video announcements, and presentations at community gathering sites (e.g. schools, the hospital, Basha's supermarket, the Post Office). The tribal government can also draw upon the resources of Healthy Nations, an organization which has developed audio-visual production facilities and expertise in conducting past campaigns against substance abuse.

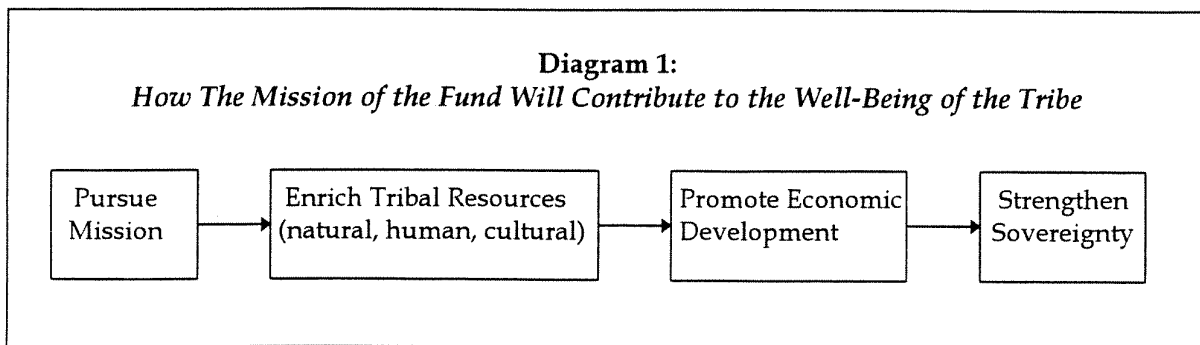
Personal outreach efforts: The tribal government should also engage in more personal outreach efforts focused on building agreement and support among tribal members about the mission of the Fund. These efforts include public meetings, small focus groups, home visits and one-on-one discussions. Such community-based interactions will help foster informal word-of-mouth communication. The tribal government can also consider creating formal roles for community liaisons within the managing structure of the Fund. For instance, it can establish a Community Advisory Committee which would promote regular communication between tribal members and the managers of the Fund. Such a committee would also tap the

traditional knowledge of tribal members, thereby contributing to the cultural aspect of the Fund's mission.

Use of the Apache language: The efforts to define and build support for the mission of the Fund should utilize the Apache language as much as possible. The Apache language is a means of expressing ideas, images, stories, and lessons which cannot always be expressed as eloquently in English. Involving fluent Apache speakers in the consensus-building effort will broaden the reach of the message, while reinforcing a precious element of Apache culture. The Tribe can also consider creating a voluntary or part-time position for a bilingual public relations director who can devote his efforts toward communicating with tribal members about the mission of the Fund.

Arguments the Tribe Can Use to Build Support for the Mission

The Tribe can build support for the mission of the Fund by highlighting several points which are illustrated in the following diagram and discussed in detail below.



Provides opportunities for tribal youth: As mentioned earlier, the mission of the Fund will promote the education and career development of young tribal members by reconnecting them with the land and challenging them to manage it well. In addition, the development of enterprises related to ecotourism may create some job opportunities for tribal youth and encourage them to learn more about their land (see next paragraph). The tribal government cannot emphasize enough the argument that the Fund's mission will provide opportunities for

tribal youth, since there is widespread concern among tribal members for the future well-being of their children.

Promotes the economic health of the Tribe: The mission of the Fund will strengthen the Tribe's economy in areas such as ecotourism and natural resources management. "Ecotourism" refers to recreation-based enterprises such as Apache-led tours and nature excursions. Such activities may create some jobs, in addition to attracting more visitors to existing amenities such as the ski resort and the casino. These activities will also encourage tribal members to learn more about their land (e.g. nature excursions may create the demand for knowledgeable "Apache guides"). In developing both ecotourism and natural resources management, the Tribe has the unique opportunity to demonstrate that economic development can be pursued without sacrificing the natural resources of an area.

Strengthens the Tribe's sovereignty: Asserting stewardship over its natural resources and developing nature-based enterprises will help strengthen the Tribe's sovereignty. By training tribal members to assume positions in natural resources management, the Tribe will lessen its dependency on the non-tribal members that currently fill these positions. By promoting nature-based ventures, the Tribe can develop individual entrepreneurship and self-reliance, thereby reducing dependency on the government for jobs and assistance. Achieving the mission of the Fund will thus indirectly help the Tribe exercise its sovereignty.

MANAGING THE FUND

To accomplish the mission of the Fund, the tribal government should must establish structures and policies to manage the Fund effectively. This section provides four steps which the tribal government can take to achieve this task:

- | | |
|--------------------|---|
| Step One: | Create an oversight body for the Fund |
| Step Two: | Choose a management structure for the Fund |
| Step Three: | Identify criteria for selecting projects |
| Step Four: | Establish measures of accountability |

STEP ONE: CREATE AN OVERSIGHT BODY FOR THE FUND

The tribal government should create an oversight body such as a Board of Directors (“Board”) to articulate a strategic vision for the Fund, approve projects and determine the policies for managing the Fund’s assets. In setting broad policies, the oversight body will ensure that the uses of the Fund remain consistent with its mission and that the Fund continues to grow financially. Distinguishing the policy-making role of the Board from the daily management of the Fund will create a political buffer which will contribute to the legitimacy of the Fund in the eyes of tribal members. A Board of Directors will also contribute to the sense of legitimacy for outsider funders who are more familiar with board structures than with tribal governments. In establishing a Board, the tribal government should adopt the following recommendations:

Size and composition of the Board: The size of the Board should be limited to seven members. This number is large enough to include a variety of perspectives from the reservation but not so unwieldy that communication and decision-making become difficult. The Board should contain one representative from each of the four political districts, plus three members who are appointed by the Tribal Council. This seven-member Board should include at least one elder and one youth, to draw upon the wisdom of the older generation as well as the voice of the younger generation. The Board should also include one member in each of the

following areas of expertise: financial management, general management, and natural resource management. These target requirements will ensure that a variety of perspectives contribute to the oversight of the Fund.

Due to the potential difficulty involved in creating an entire Board with the desired qualifications, the Board policy should allow flexibility in meeting these criteria. For example, the Board policy should allow any member to satisfy more than one criterion simultaneously (e.g. a tribal elder with management expertise who represents a particular district). The potential difficulty in locating qualified Board members should also allow for a policy which permits non-tribal members to sit on the Board. Non-tribal members can contribute to a sense of external legitimacy without compromising legitimacy in the eyes of tribal members, as long as the non-tribal members are eligible for the three appointed positions only.

Selection process for Board members: To select the members of the Board, each of the four political districts should choose one representative to sit on the Board, while the Tribal Council appoints three additional members. This policy will encourage tribal members to participate in the management of the Fund, while ensuring the selection of some members with expertise in specific areas. This selection process will combine the advantages of both a popular election and an appointment process. It will limit tribal leaders from exercising political patronage in determining the entire composition of the Board, and it will help insulate Board members from the pressure to respond to inappropriate requests from individual constituents. The selection process will thereby shield the Board from political pressures from both the constituents and the Tribal Council.

Term length and structure: The most appropriate term length for each Board member is four years. This is a reasonable time period which is long enough to allow members to make a positive impact on the administration of the Fund, but short enough to involve new members with fresh ideas to join the Board. To ensure stability and continuity, the Tribe should stagger the terms so that three or four of the board members are selected every two years. The Board policy should also limit the number of consecutive terms of service to two, in order to involve more tribal members in the management of the Fund and to prevent the entrenchment of certain political interests. Finally, the Board of Directors should meet at least once a month,

except in the early stages of the Fund which would require that they meet on a more frequent, ad hoc basis.

STEP TWO: CHOOSE A MANAGEMENT STRUCTURE FOR THE FUND

The tribal government must determine the most appropriate structure for the daily management of the Fund. This management structure will be responsible for daily operations, including project management and personnel decisions. While the role of the management structure will remain separate from the policy-making role of the Board of Directors, ideally the two will consult each other regularly to ensure that they are both pursuing a common mission for the Fund. In considering its options, the tribal government should select a management structure which best meets the following criteria:

MISSION:	Promotes the mission of the Fund
IMPACT:	Maximizes the impact of the Fund ("bang")
COST:	Minimizes the administrative costs of the Fund ("buck")
FEASIBILITY:	Addresses existing management capacity and political constraints
INSULATION:	Insulates the Fund from tribal and constituent politics

By evaluating its options according to these criteria, the tribal government can choose a management structure which is most likely to promote the success of the Fund. Offered below are four management options which the tribal government can consider when making this choice.

MANAGEMENT STRUCTURE OPTIONS

- 1. Solicit projects from various departments**
- 2. Create a new restoration program**
- 3. Establish a non-profit organization**
- 4. Found a quasi-independent institute**

OPTION ONE: *Solicit projects from various departments*

This option would require that the Board of Directors for the Fund solicit project proposals from existing departments, such as the Heritage Program and Tribal Game and Fish, and choose the ones which will receive funding. The Board would then allocate the funds among the selected departments which will implement the projects and comply with an evaluation process. The Board would thus retain authority for approving the projects that receive funding, while the individual departments would manage the projects according to certain guidelines. Through the project solicitation process, this option would foster healthy competition among various departments. This option may require hiring a full-time, salaried project manager who would analyze the proposed projects, make recommendations to the Board, and track the progress of the projects.

OPTION ONE: Solicit Projects

Criteria	Advantages	Disadvantages
Mission		<ul style="list-style-type: none"> • Does not meet mission in an integrated manner
Impact	<ul style="list-style-type: none"> • Encourages creativity among departments 	<ul style="list-style-type: none"> • Does not institutionalize restoration
Cost	<ul style="list-style-type: none"> • Relatively simple to administer • Can draw upon existing resources • Provides flexible funding 	
Feasibility	<ul style="list-style-type: none"> • More stable/less risky to establish 	<ul style="list-style-type: none"> • Insufficient management capacity • Difficult to find qualified project manager • Difficult to ensure accountability
Insulation		<ul style="list-style-type: none"> • Not enough legitimacy among tribal members • May create a political lightning rod • Could strain existing tensions among departments

Advantages:

- **Encourages creativity among departments.** This option would encourage the departments competing for funds to be creative in preparing project proposals.

- **Relatively simple to administer.** This option would not require a new, extensive administrative structure, other than a Board and a full-time project manager.
- **Can draw upon existing resources within the tribal government.** The departments receiving funding would use existing resources such as administrative support.
- **Provides flexible year-by-year funding.** This option gives the Board flexibility by establishing a process by which it can review ongoing projects and determine whether they should continue to receive funding.
- **More stable and less risky than establishing a new institutional structure.** This option would enhance the stability of the existing departments and may be less politically risky than establishing a new institution.

Disadvantages:

- **Does not meet the mission of the fund in an integrated manner.** By diluting the money through several channels of implementation, this option would fail to meet the mission of the Fund in an integrated manner.
- **Does not institutionalize restoration within the Tribe.** This option would not promote the structural change needed to establish the importance of restoration within the government and the community.
- **Insufficient technical knowledge and management capacity.** Few existing departments have the technical knowledge and management capacity needed to design and implement effective restoration projects.
- **May be difficult to locate a qualified project manager.** Given the current training and skills of most tribal members, it may be difficult to locate a tribal member with the necessary skills to fill the role of a project manager.
- **Difficult to ensure accountability.** This option would lack an incentive mechanism, other than the threat of losing future funding, to encourage the departments to administer the funds efficiently.
- **May not gain enough legitimacy among tribal members.** This option may not be visible enough for constituents to feel satisfied that the funds are being used effectively, a problem which was associated with the 22-D fund.
- **May create a political lightning rod.** A Board of Directors with the authority to select projects could present an easy target for blame by dissatisfied constituents, and could be vulnerable to pressure from tribal leaders to fund particular projects.

- **Could strain existing tensions between departments.** This option may exacerbate existing tensions among different departments, especially if some departments feel that their projects are passed over for political or interpersonal reasons.

OPTION TWO: *Create a new restoration program*

This option involves creating a new restoration program within an existing department to manage the Fund. Since the Planning Department has been largely responsible for carrying out existing restoration projects, it would be the most logical place to establish a new restoration program. The new program would plan, implement and evaluate projects, while consulting with other departments on a fairly informal and fluid basis. This option would formally separate the oversight body, the Board of Directors, from the managing structure for the Fund. However, a new restoration program may require hiring new staff members or relocating existing staff and administrative support from other programs to carry out the projects.

OPTION TWO: New Restoration Program

Criteria	Advantages	Disadvantages
Mission		
Impact		<ul style="list-style-type: none"> • Does not institutionalize restoration
Cost	<ul style="list-style-type: none"> • Centralizes the management of the Fund within a discrete program • Can draw upon existing resources 	
Feasibility		<ul style="list-style-type: none"> • May not be feasible due to Planning Department's consolidation phase • Staffing the program could be politically difficult
Insulation	<ul style="list-style-type: none"> • Locates the Fund within a relatively stable and proactive department 	<ul style="list-style-type: none"> • May not gain enough legitimacy among tribal members • Could strain existing tensions between Planning Dept. and other tribal entities

Advantages:

- **Centralizes the management of the Fund within a discrete program.** Rather than dispersing project implementation among different departments, this option would create a discrete program which would manage the projects in an integrated manner.

- **Can draw upon the existing management capacity in the Planning Department.** The planning staff members currently involved in managing existing restoration projects could be brought together to staff the new program.
- **Would locate the Fund within a relatively stable and proactive department.** A new program within the Planning Department would enjoy a certain degree of political security from being located under the Chairman's office, and would benefit from collaboration with other planning programs.

Disadvantages:

- **Does not institutionalize restoration within the Tribe.** This option does not depart from the current management structure enough to establish the importance of restoration within the government and the community.
- **May not be feasible given the current priorities of the Planning Department.** The Planning Department is currently in a "consolidation" phase in which it is seeking to contain its recent rapid growth and may not approve of creating a new program.
- **Staffing the program could be a politically difficult venture.** If the Planning Department is at all territorial, it may be difficult to draw planning staff from existing programs to a new restoration program.
- **May not gain enough legitimacy among tribal members.** Some tribal members may view the creation of a new program within a tribal department as an insufficiently accountable or representative option.
- **Could strain existing tensions between the Planning Department and other tribal entities.** Creating a new program within the Planning Department could breed tension among tribal members who resent what they perceive to be the department's unchecked authority in setting tribal policies.

OPTION THREE: *Establish a non-profit organization*

This option involves establishing a tribally-chartered non-profit organization which would permanently house the restoration fund. Doing so would require: 1) passing a tribal resolution to charter the creation of the non-profit organization; and 2) filing an application with the Internal Revenue Service (IRS) to attain 501(c)(3) tax exempt status³ (see APPENDIX A:

³ Section 501(c)(3) refers to the section of the IRS code which allows certain "religious, charitable, scientific, or educational organizations" to pass on to their donors the right to deduct the amount of their donation when calculating their personal income taxes ("subject," of course, "to other provisions of the law").

Requirements For Filing an Application for Non-Profit Status). The Tribe's Legal Department would work together with tribal officials to accomplish these two tasks. Because the Tribe already qualifies as a government non-profit organization in the state of Arizona, any non-profit organizations chartered by the Tribal Council would automatically attain non-profit status under state law. This option would involve hiring a full-time, salaried project manager to handle daily project management, as well as one or two support staff members to provide administrative assistance. Creating a non-profit organization would also require hiring or relocating staff members with restoration expertise from other programs. These staff members would consult and work together with the project manager and with other natural resource departments to plan and implement the restoration projects.

OPTION THREE: Non-Profit Organization

Criteria	Advantages	Disadvantages
Mission	<ul style="list-style-type: none"> Pursues mission of the Fund in an integrated manner 	
Impact	<ul style="list-style-type: none"> Institutionalizes restoration 	
Cost		<ul style="list-style-type: none"> Would not quickly establish a management structure
Feasibility	<ul style="list-style-type: none"> Would attract attention and funding from outside sources Builds on previous experience 	<ul style="list-style-type: none"> Requires additional staffing Difficult to locate qualified project manager
Insulation	<ul style="list-style-type: none"> Insulates the Fund from tribal and constituent politics 	<ul style="list-style-type: none"> Not enough legitimacy among tribal members

Advantages:

- **Pursues the mission of the Fund in an integrated manner.** This option would establish a discrete organization which would pursue the mission of the Fund by managing projects in an integrated manner.
- **Institutionalizes restoration within the Tribe.** Establishing a new organization devoted to the Fund would establish the importance of restoration within the government and the community.
- **Would attract attention and funding from outside sources.** Outside funders, who are more familiar with a non-profit organization than with the tribal government, may be more willing to provide support for the Fund. The organization's non-profit status would also make it eligible for funding from additional sources.

- **Insulates the Fund from tribal and constituent politics.** By establishing an organization separate from the rest of the tribal government, this option may insulate the Fund from tribal and constituent politics.
- **Builds on previous experience.** The Tribe has already undergone the application process to secure 501(c)(3) non-profit, tax-exempt status for a community development corporation and for a school.

Disadvantages

- **Requires additional staffing which may be difficult to obtain.** A non-profit organization would require additional staff members with technical expertise who would be newly hired or relocated from other departments.
- **May be difficult to locate a qualified project manager.** Given the current training and skills of most of the tribal members, it may be difficult to locate a tribal member with the necessary skills to fill the role of a project manager.
- **May not gain enough legitimacy among tribal members.** Although two non-profit organizations currently exist on the reservation, many tribal members do not appear to be familiar with the role or function of non-profit organizations.
- **Would not quickly establish a management structure.** After applying for non-profit status for this organization, the Tribe must wait from six months to a year before the federal government grants official recognition.

OPTION FOUR: *Found a quasi-independent institute*

This option involves establishing a quasi-independent institute which would pursue the mission of the Fund in an integrated manner. This institute would oversee projects but also coordinate them among different departments, serving as a centralized “brain” rather than as the sole managing entity. An institute would provide a place to gather knowledge and draw expertise together, as well as offer work and learning opportunities for young tribal members pursuing careers in natural resources management. The institute would serve as a teaching agent which would collect, store, and disseminate knowledge that would inform future restoration projects. The institute would also train tribal members to take stewardship over the land and would ideally become fully staffed by tribal members at some future point. In the meantime, establishing an institute would require relocating staff members from other existing programs, particularly from the Planning Department, and hiring one or two support staff members to provide administrative assistance. A suitable location for the institute would be at

Fort Apache, a historically significant place whose ties to the Heritage and Tourism programs would encourage the integration of the cultural aspect of the Fund's mission. The relatively independent status of the institute would rely upon outside foundation support as well as money from the Fund.

OPTION FOUR: Institute

Criteria	Advantages	Disadvantages
Mission	<ul style="list-style-type: none"> Pursues mission in an integrated manner 	
Impact	<ul style="list-style-type: none"> Institutionalizes restoration Long-term stability and personnel development Comprehensive focus on education Collaborative relationships with other departments Symbolic importance 	
Cost	<ul style="list-style-type: none"> Attention and funding from outsiders 	<ul style="list-style-type: none"> Administrative costs may be high Reliance upon non-tribal members for expertise
Feasibility	<ul style="list-style-type: none"> Builds upon a successful model established by the Tribe 	<ul style="list-style-type: none"> May not gain enough legitimacy among tribal members May not be viewed as providing tangible results May not have clear lines of accountability
Insulation	<ul style="list-style-type: none"> Addresses problem of political distribution 	<ul style="list-style-type: none"> May be viewed as a political threat

Advantages:

- Pursues the mission of the Fund in an integrated manner.** By bringing together experts, practitioners and students from the relevant disciplines under one roof, the institute would pursue the mission of the Fund in an integrated manner.
- Institutionalizes restoration within the Tribe.** Founding an institute would establish the importance of restoration within the government and the community, and provide it with a permanent place on the reservation.
- Provides long-term stability and personnel development.** A quasi-independent institute would provide long-term stability which would enhance the goal of developing the skills and knowledge of tribal members.

- **Would provide more of a comprehensive focus on education.** An institute would place a comprehensive focus on education through providing technical assistance to schools and youth programs to implement restoration projects.
- **Could innovate new, collaborative relationships with other departments.** As a new entity, the institute could more easily foster new, collaborative ties with other departments such as Healthy Nations, Outdoor Recreation and the Heritage Program.
- **Establishing this institute would endow the Fund with symbolic importance.** By founding an institute devoted to the mission of the Fund, the Tribe would signal to its members in a visible, high-impact way the degree to which it values the mission of the Fund.
- **Would attract attention and funding support from outsiders.** By framing the institute as a model for sustainable development, the Tribe would draw a good deal of favorable attention and funding from outside foundations and investors.
- **Builds upon a successful model established by the Tribe.** The Tribe has had experience with this type of quasi-independent entity through the successful administration of Healthy Nations, indicating that a similarly independent institute may also succeed.
- **Would help address problem of political distribution.** By acting as a centralized entity which coordinates educational programs throughout the schools on the reservation, the institute would counter the potential risk of favoring particular groups or areas.

Disadvantages:

- **Administrative costs may be high.** Building an institute could incur high administrative costs which could reduce the money available for projects, unless the institute leverages additional funding from outside sources.
- **Would rely upon non-tribal members to provide expertise.** For the short-term, the tribal government would need to recruit outside experts for management, administrative and technical expertise, which may not be viewed favorably by some tribal members.
- **May not gain enough legitimacy among tribal members.** To the extent that an institute is perceived as a foreign entity staffed by outsiders who are the primary beneficiaries, this option may not gain enough legitimacy among tribal members.
- **May not be viewed as providing tangible results to the Tribe.** Some tribal members may fail to recognize the benefits provided by the institute, especially since progress would not be immediate and would be difficult to measure.

- **May not have clear lines of accountability.** As a new, quasi-independent entity, the institute could not rely upon formerly established lines of accountability and authority, which could lead to confusion and “turf battles.”
- **May be viewed as a political threat.** In light of the traditional centralization of power among the White Mountain Apaches, tribal leaders may not support an institute if they view it as a political threat to their authority.

The table below provides a checklist which sums up how each of the proposed options meet the five criteria for the management structure of the Fund.

Filtering Each Management Structure through the Criteria

CRITERIA	MANAGEMENT STRUCTURE OPTIONS			
	Solicit Projects	New Program	Non-Profit Organization	Institute
Mission	--	?	√	√
Impact	--	--	√	√
Cost	√	√	?	?
Feasibility	√	?	√	?
Insulation	--	--	?	√

Legend:

- √ = Option satisfies the criteria
- ? = Option may or may not satisfy the criteria
- = Option does not satisfy criteria

RECOMMENDATION: *Establish a Non-Profit Restoration Institute*

The tribal government should found an institute with non-profit status, a management structure which will combine the benefits of both options three and four. The Tribal Council should adopt a charter for this organization which would establish the guidelines for its operation. This management structure best meets the five criteria mentioned earlier, especially “mission” and “impact.” A non-profit institute will draw together staff resources on the reservation, as well as outside expertise, to promote the mission of the Fund in an integrated, comprehensive manner. The non-profit institute will also present a visible, high-impact use of

the Fund, by pursuing land restoration and providing a place for tribal members to work and learn about the land and their cultural heritage. The institute provides an unmatched educational opportunity for the Tribe, in that it will coordinate programs among existing schools which will serve as satellite arms of the institute. Not only will the institute highlight the importance of land restoration on the reservation, but it will translate traditional knowledge into modern management and education. In sum, this option present a unique opportunity for the Tribe to achieve the mission and goals of the Fund in a high-impact way.

The benefits of a non-profit institute far outweigh its potential costs. While founding a non-profit institute may incur significant administrative costs, the tribal government can draw from the management capacity of existing programs in other departments. In addition, leveraging funding from outside sources can offset the administrative costs of establishing the institute. The non-profit status of the institute will enable it to attract additional funding from outside sources. In terms of feasibility and insulation, tribal leaders can counter some of the political concerns mentioned earlier by educating tribal members about the benefits of the institute and involving the community in the task of defining its role. This consensus-building process will frame the institution in a manner which makes it clear that its aim is not to serve the research needs of outsiders, but to develop the resources of the Tribe and to achieve someday the goal of full staffing by tribal members. Finally, by supporting the reservation's schools, which are distributed throughout the districts, the institute would reduce the risk of favoring particular districts, thereby addressing the potential problem of political distribution.

STEP THREE: IDENTIFY CRITERIA FOR CHOOSING PROJECTS

To prioritize and choose the restoration projects which will receive funding, the managers of the Fund should use a selection framework that provides a set of criteria by which to evaluate the merits and shortcomings of potential projects. The fund managers can use this selection framework as a filter through which all projects enter during the application and review process. Listed below are four criteria areas which can form the selection framework for this fund. The managers of the Fund may find value in ranking the four criteria areas to determine which are more important to satisfy than others. The managers of the Fund need not feel limited to these criteria areas, and should modify the list as needed.

CRITERIA FOR CHOOSING PROJECTS

Relevance

- **Relation to the mission of the Fund:** Any project which does not promote the mission of the Fund should not be funded. Projects which pursue more than one goal of the Fund should receive priority.
- **Objectives:** The objectives of the project should be clear, succinct and achievable.

Impact

- **Development of tribal member skills:** The proposal should indicate how the project will develop skills and expertise among tribal members.
- **Impact on the environment:** The proposal should summarize the project's positive and negative impacts on the surrounding environment.
- **Impact on the quality of life:** The proposal should summarize the project's positive and negative impacts on the quality of life for the Tribe.

Feasibility

- **Projected costs of the project:** The proposal should include an itemized budget estimating the costs of the project in terms of human and financial resources.
- **Implementation plan:** This plan should specify the actors, the tasks and the timeline for the project.
- **Short- and long-term strategies:** The proposal should include short- and long-term strategies since most restoration projects have long life spans.
- **Obstacles to implementation:** The proposal should include a description of potential and actual obstacles, which could be programmatic, economic, political or cultural in nature.
- **Measures of accountability:** The proposal should explain how the actors will be held accountable for completing their tasks during project implementation.

Sustainability

- **Revenue-generating:** The proposal should indicate whether the project is expected to generate its own revenues through user fees, donations, or other revenue sources.
- **Need for additional future funding:** The proposal should explain whether the project will require a later infusion of human or financial capital to cover costs.
- **Eligibility for matching funds:** The proposal should indicate whether the project is eligible for matching funds and include a list of potential and committed funders.

STEP FOUR: ESTABLISH MEASURES OF ACCOUNTABILITY

One of the primary lessons gleaned from the Tribe's experiences with the 22-D fund is the importance of establishing measures of accountability in order to secure the proper management of the Fund. Establishing these measures will not only ensure that the managers of the Fund comply with their responsibilities, but will also build legitimacy in the eyes of tribal members. The following measures will help the tribal government build accountability into the Fund: **benchmarks, an evaluation process, and an annual report.**

BENCHMARKS

Benchmarks refer to guideposts which the managers of the Fund can use to measure the progress of the projects undertaken. Short-term benchmarks involve biannual or annual targets, while long-term benchmarks refer to five-, ten-, fifteen-, or twenty-year targets. Benchmarks can be used to measure the general progress of the Fund as well as the progress of individual projects. The Board of Directors, the managers of the Fund, and community members should work together to establish ambitious, yet realistic, benchmarks for both the Fund and for individual projects.

Some benchmarks will require technical assessments of land restoration projects, and should be established by the managers who carry out the projects. However, many benchmarks will also measure progress in achieving the goals of educational advancement and cultural maintenance. In fact, these goals may be more easily measurable than land restoration. The following are examples of such benchmarks for which the managers of the Fund can set fixed-year, numerical targets:

- Tribal members trained in specific land restoration techniques
- Tribal youth involved in summer youth programs related to restoration
- Tribal youth paired with restoration mentors
- Students enrolled in associate, bachelors and masters programs in natural resources
- Tribal members who graduate and are hired to work on restoration projects
- Tribal members enrolled in restoration-related job training programs
- Tribal members conducting projects using community evaluation techniques
- Communities with self-initiated restoration programs

EVALUATION PROCESS

A biannual evaluation process will allow the Fund managers to assess the progress of ongoing projects, measure the value provided by the projects, and determine whether they should continue to receive funding. To identify areas for improvement and to filter out which projects should cease to receive funding, the evaluation process must accurately indicate and quantify, when possible, the shortcomings and the strengths of the projects. This process should employ the benchmarks mentioned earlier to measure the success of individual projects in meeting *substantive* targets. In addition, the evaluation process should include an assessment of how well the project is being administered *procedurally*. In establishing the criteria for evaluating projects, the managers of the Fund can refer to the selection criteria used for choosing the projects.

The managers of the Fund will primarily be responsible for conducting the evaluations, but they should also involve tribal members from individual communities to assist in the effort—perhaps through public hearings or community meetings. Involving communities in the evaluation process will encourage them to assume responsibility for restoring their land, and will also strengthen the incentive for the managers of the Fund to remain accountable. The Cibecue community has begun a self-evaluation to assess the needs of its tribal members, a process which can form the framework for a community-based evaluation of restoration projects. The final stage of the evaluation process involves producing an internal report for the Board of Directors of the Fund, which it will then use to decide which projects receive additional funding.

ANNUAL REPORT

A third measure of accountability is to publish an annual report which will describe the overall progress of the Fund, specify the projects undertaken that year, and mention future trends and strategies in managing the Fund. Importantly, the annual report will also provide the financial statements of the Fund and, ideally, an externally-prepared audit. The financial information will include itemized budgets for individual projects and for the Fund as a whole, as well as information on the investments made for the Fund. Publishing an annual report will

build accountability into the Fund by providing a measure of transparency. In the process, the annual report will assist the Board of Directors and the managers of the Fund in building the legitimacy of the Fund in the eyes of both tribal members and outsiders.

To ensure its effectiveness as an accountability tool, the Board of Directors and the managers of the Fund should distribute the annual report widely among all interested parties. These parties include the Tribal Council, the Chairman, tribal members and outside funders. The annual report should also be distributed to the media involved in the public relations effort, in order to contribute to the general awareness of the Fund. An annual report is a valuable tool for building accountability into the general management of the fund, as well as the finances of the fund, which are discussed in the following section.

BUILDING THE FUND

The interest income on the \$4.4 million restoration fund is estimated to range from \$250,000 to \$400,000 per year. *This is not a large sum of money* to fund projects which collectively benefit the Tribe. Given this limited amount of available income, the tribal government must think strategically about how to build the Fund and increase its long-term impact. The tribal government can build the Fund in two ways: by pursuing savvy investment strategies and by soliciting additional funding from outside sources.

INVESTMENT STRATEGIES

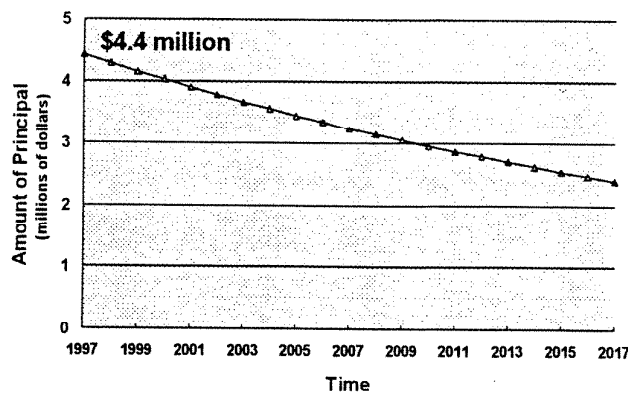
By making strategic investment choices, the tribal leaders can protect the principal of the Fund while increasing the level of interest it earns. The following recommendations will assist them in making these choices:

- Place the fund money in a restricted account for at least one year
- Reinvest a portion of the interest each year to protect the principal
- Determine the appropriate rates of risk and return
- Diversify, diversify, diversify
- Consider hiring an outside investment advisor

Place the fund money in a restricted account for at least one year: The tribal government should place the entire fund in an account which cannot be touched for at least one year. No restoration projects should be funded during this period of time, which will allow the first year's interest to accrue and contribute to the principal of the Fund. More importantly, this one-year grace period will allow the Tribe to establish the overall investment policies for the Fund. The Tribal Council can codify these policies in the Fund's ordinance, which will also transfer the fund money from the Treasurer's office to the managing structure and state the duties of the Board of Directors in managing the finances of the Fund. By tucking the Fund money away for a temporary period of time, the Tribe will send the signal that it intends to protect the Fund while procedures and institutions are put in place to administer it properly.

Reinvest a portion of the interest each year to protect the principal: As stated above, the amount of interest income from the Fund will likely range from \$250,000 to \$400,000 per year. However, if the Tribe uses all of this interest to fund projects each year, the principal of the Fund will not only fail to grow, but will actually erode steadily due to inflation (see Diagram 2). To protect the principal of the Fund and ensure that it grows, the managers of the Fund must reinvest a portion of the interest income into the principal each year. In considering this issue, the Fund managers should establish growth goals for the Fund which will involve decisions regarding the scale and the rate of reinvestment into the Fund. For example, the managers of the Fund can consider plowing a larger portion of the interest income back into the principal during the early years of the Fund, thus building the endowment for later projects.

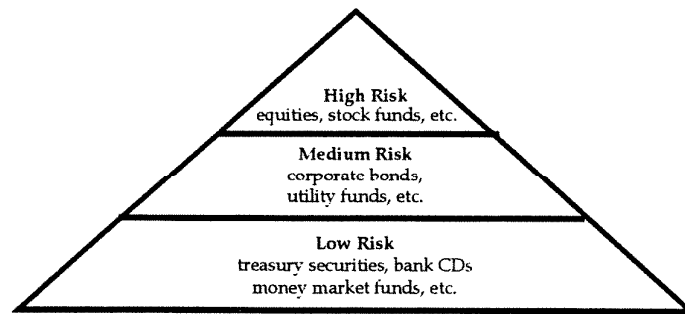
Diagram 2:
Effect of Inflation on Principal of the Fund Over Time
(assuming 3% inflation and no reinvestment of interest)



Determine the appropriate rates of risk and return: In general, the expected return of a particular investment is inversely related to the level of risk it poses. For example, a low-risk municipal bond will provide modest returns at an assured rate, while a high-technology stock offers a much higher expected return but at a greater risk of loss (see Diagram 3).⁴ When establishing investment policies for the Fund, as well as for the other assets of the Tribe, the tribal government must determine the levels of risk and return it is willing to accept. Currently, the tribal government is pursuing an overall investment strategy which involves mostly low-risk, low-return certificates of deposit (CD's), Treasury bills and some stocks and

bonds. While the return on these investments averages from 5-7 percent a year, the tribal leaders may be able to increase the amount of the interest earned on the Fund by choosing a more aggressive investment strategy.

Diagram 3:
Risk Pyramid for Various Investments

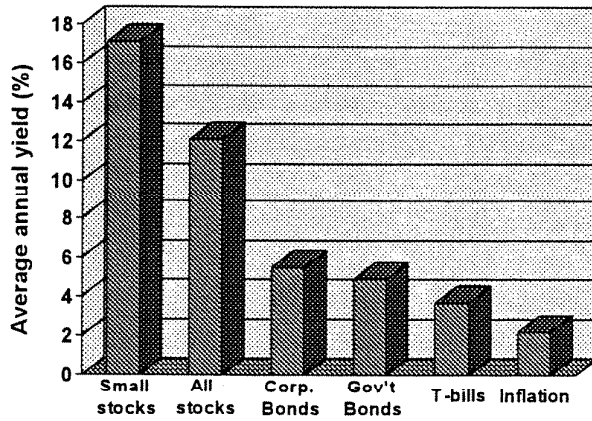


Diversify, diversify, diversify: While tribal leaders may hesitate at the idea of assuming higher levels of risk in order to achieve higher returns, one key strategy which can alleviate this concern is to diversify the investments of the Tribe. Diversification involves holding many different types of assets in an investment portfolio so that the exposure to any particular asset is limited (see Diagram 4).⁵ By combining a variety of assets, tribal leaders can increase the overall performance of the Tribe's investment portfolio while minimizing the overall risk. For instance, the Tribe can invest 30 percent of the Fund in high-risk assets such as equities, 30 percent in medium-risk assets such as corporate bonds, and 30 percent in low-risk assets such as treasury securities. While not all risk can be diversified away by pursuing such a strategy, a well-diversified portfolio can offer greater returns at a lower level of risk than if the Tribe were to limit its investments to a few assets. The Tribe can also consider investing in a mutual fund, an investment company which would place its money in a specified portfolio of securities.

⁴ *Investment Principles: What You Need to Know To Manage the Tribe's Financial Investments* by Gelvin Stevenson, 1994

⁵ *ibid.*

Diagram 4:
Average Annual Returns by Asset (1926-1990)



Consider hiring an outside investment advisor: Tribal leaders should consider hiring an outside investment advisor who will assist in managing the Fund's assets. The tribal government should make this decision as part of its overall strategy for managing the tribal assets, not just for the restoration fund. Making wise investments requires a degree of knowledge and sophistication about financial markets which the Tribe does not yet possess in-house. Until this expertise is developed, tribal leaders should investigate several options for obtaining financial advice on the Tribe's investments. The Tribe can consider hiring one of the larger, well-known investment firms, or a smaller firm targeted toward American Indian clients (see APPENDIX B: *Sample List of Investment Advisors*). While an outside firm would retain a percentage of the profits made on the Tribe's investments as compensation, its expertise would help earn returns which would cover this fee. In hiring an outside investment advisor, the Tribe can also request that the advisor train tribal members to assume the in-house role of managing the Tribe's investments in the future.

OUTSIDE SOURCES OF FUNDING

To leverage the interest earned on the principal of the Fund, as well as expand the endowment, the managers of the Fund should seek additional funding from outside sources. This task requires establishing a grant-writing role within the managing structure of the Fund. The tribal government can create a formal, new position of a grant writer, or can informally draw upon the existing skills of staff members within the tribal government. The role of grant writer will involve researching and apply to outside sources of funding, as well as training other staff members to craft articulate grant applications.

Through the aggressive solicitation of grants and adept planning, the managers of the Fund may be able to double or even triple the amount of funds available for projects, in addition to building the principal of the Fund. However, outside funding may be difficult to obtain the first year of the Fund, since writing quality grant proposals requires expertise, time, and energy which may be directed toward managing other areas during the first year. Developing grant-writing skills among tribal members and steadily improving the quality of grant applications will increase the likelihood of obtaining outside funding.

Types of funding: The managers of the Fund should keep in mind that there are many different types of funding for which they can apply. The Fund managers can apply for matching grants as well as “conventional” grants which do not have any strings attached. Alternatively, the restoration fund could itself serve as a match for grants provided by sources requiring a match. The success with which the managers of the Fund access outside funding will also partly depend upon the types of projects which they choose to implement. The managers of the Fund should seek funding from sources which not only support individual projects, but also contribute to the endowment of the Fund.

Sources of funding: There are a multitude of outside organizations--private, public and non-profit--which could offer additional funding for the restoration fund. For example, the managers of the Fund can explore opportunities from the local, state, and federal levels of government. Agencies such as the Department of Interior, the Environmental Protection Agency, and the state Department of Environment Protection may provide program-matching

funds. Many private foundations are also eager to support “cutting edge” issues such as environmentally sustainable development. Some examples include the Ford Foundation, the Robert Wood Johnson Foundation, the Seventh Generation Fund, and the International Institute for Sustainable Development (see APPENDIX C: *Sample List of Possible Funding Sources*). The managers of the Fund can also tap into the foundations which have provided support to the Zuni Conservation Project, a similar land restoration project administered by the Zuni Nation.

Researching sources of funding: The managers of the Fund should consult directories which list grant-making foundations, such as *The Environmental Grant-Making Foundations 1996 Directory*, published by the Environmental Data Institute. These directories provide comprehensive information on eligibility requirements, funding criteria and restoration projects which have received past funding. The directories may also be available in the fields of cultural maintenance and tribal education. In addition, the managers of the Fund should consult computer or internet databases which provide the names of funding organizations and foundations (see APPENDIX D: *Sample List of Research Sources for Funding*). One such database, the *Social Program Information Network* (SPIN), is available at all major libraries and provides contact information, eligibility criteria, annual reports, and a list of projects which have recently received funding (see APPENDIX E: *Sample Research Result for SPIN Database*).

CONCLUSION

The 22-H fund provides a momentous opportunity for the White Mountain Apaches to take significant strides toward restoring their land and their relationship to the land. To leverage the stream of interest from the Fund, tribal leaders must make strategic choices in establishing the policies for managing the Fund. In assisting the Tribe in getting the most “bang for the buck,” this report proposes the following recommendations:

RECOMMENDATIONS

- **Define and build support for the mission of the Fund**
- **Create a Board of Directors to oversee the Fund**
- **Found a non-profit institute to manage the daily operations of the Fund**
- **Build the Fund through investment strategies and outside funding**

These recommendations address three key tasks which the tribal government must accomplish in order to ensure the success of the Fund: 1) **define the mission of the Fund**, 2) **create institutions to manage the Fund**, and 3) **build the finances of the Fund**. Accomplishing these tasks will enable the Tribe to build legitimacy for the Fund, create sound institutions which shield it from political influence, and increase its financial impact.

The 22-H fund offers the White Mountain Apache Tribe the chance to leave a legacy for its children, by expanding their opportunities and ultimately improving their quality of life. In wisely managing its natural resources, the Tribe can provide a model of sustainable development to the outside world. The Fund also presents the Tribe with the opportunity to strengthen its sovereignty by establishing institutions which will lessen tribal dependence on the government. To capitalize on these opportunities, tribal leaders must take bold steps which will help secure the benefits offered by the Fund.

APPENDICES

APPENDIX A: *Requirements For Filing an Application for Non-Profit Status*

APPENDIX B: *Sample List of Investment Advisors*

APPENDIX C: *Sample List of Possible Funding Sources*

APPENDIX D: *Sample List of Research Sources for Funding*

APPENDIX E: *Sample Research Result for SPIN Database*

APPENDIX A:

Requirements For Filing An Application for Non-Profit Status

To file an IRS application with the federal government for non-profit status, the Tribe will need to include the following:

The Board of Directors

The Tribe will need to establish a Board of Directors and identify the Board members in the application. This list should include the titles, organizations, and areas of expertise of each board member. This report has already offered concrete recommendations about the logistics of the board.

The Mission Statement

The Tribe will need to develop a mission statement for the non-profit organization. The mission statement for non-profits may can be defined in one sentence, but is more frequently defined in one short paragraph. The Tribe should be able to draw from the mission section in this report to develop a mission for the non-profit organization.

The By-Laws

The Tribe will need to develop a set of by-laws governing the daily operations of the non-profit organization and the general policy-making decisions of the Board members. The legal department should have literature and expertise available to assist in the creation of appropriate by-laws.

The Business Plan

The Tribe needs to explain what the non-profit organization will do and what distinguishes it from other non-profit organizations. Here, the Tribe should highlight the uniqueness of the restoration Fund and describe how the non-profit status of the organization will help achieve the mission and goals of the Fund. Again, the Tribe can use this report to help generate ideas.

APPENDIX B:

Sample List of Investment Advisors

DLA Financial, Inc.
World Trade Center, Suite 122
San Francisco, CA 94111
415-288-8500
contact: Deni Leonard

First Nations Development Institute
The Stores Building
11917 Main Street
Fredericksburg, VA 22408
703-371-5615

National Cooperative Bank
1401 Eye Street, 7th Floor, NW
Washington, DC 20005
1-800-955-9622
contact: Andrew Kho

APPENDIX D:

Sample List of Research Sources for Funding

GRANT DIRECTORIES

Annual Register of Grant Support: A Directory of Funding Sources, 29th Edition, Copyright 1996, Published by R.R. Bowker

Foundation Directory, Parts I and II, Copyright 1996, Edited by Margaret May Feczko and by Assistant Editor, Gina Marie Cantarella, published by The Foundation Center, New York, New York.

Guide to U.S. Foundation, Their Trustees, Their Officers, and Their Donors, 1996 Edition, Volumes 1 and 2, published by the Foundation Center, New York, New York. (Volume 1 lists independent, corporate, community foundations by subject area, and Volume 2 lists donors by last name and includes the foundations to which they donated that year).

GRANT DATABASES

Associated GrantMakers (AGM) On-Line: An automated version of AGM's publication, "Massachusetts Grantmakers," containing information on more than 500 foundations and corporations with statewide funding interests. Includes four major index areas which can be used in a grant search: *Program Interest Areas, Grantmaker Organization Type, Type of Support to Non-profit* and *Area of Geographic Focus*.

Prospector's Choice: A national database of more than 10,000 records of foundation and corporate donations detailing contact, program and financial information as well as lists of major grants awarded. Includes five major index areas which can be used for a search query: *Grantmaker Location, Recipient Location, Grant Type, Recipient Type* and *Non-Monetary Support Type*.

APPENDIX E:

Sample Research Result for SPIN Database

Program Number:09177

Establish Date:08/03/1993

Follow Up Date:11/01/1997

Review Date:12/10/1996

Sponsor:Environmental Protection Agency

George Walker

Address:

Tel:202-260-8619

*Env. Education Division (1707)
Office of Comm. Educ./Public Affairs
401 M Street, S.W.
Washington, DC 20460-
U.S.A.*

Fax:

E-MAIL:

Web Site:<http://www.eelink.umich.edu>

Deadline(s):02/21/1997

Sponsor Type:Federal

Deadline Ind:Postmark

Cost Sharing:Yes

Deadline Open:No

CFDA Number:

Funding Limit: 250000

Indirect Costs:Yes

Duration: 1 YEAR

Applicant Type(s):

Award Type(s):

- Colleges/Universities
- Educational Agencies (SLAs/LEAs)
- Educational Organizations/Inst.
- Indian Tribes/Governing Orgs.
- Non-Profit
- State/Local Agencies

- Curriculum Development
- Demonstration/Evaluation
- Development-Program
- Training/Professional Development

Target Group(s):

Citizenship(s):

- U.S.A. Citizenship (including U.S. Territories)

Geographical Restrictions:

Locations Tenable:

- NO RESTRICTIONS

- U.S.A. Institution (including U.S. Territories)

Title: EPA--Environmental Education Grants Program

SYNOPSIS:

Awards ranging from \$5,000 to \$250,000 support projects to design, demonstrate, or disseminate practices, methods, or techniques related to environmental education and training. Matching funds of twenty-five percent of the total cost of the project are required.

OBJECTIVES:

The sponsor supports projects related to environmental education and training. The goal of environmental education is to increase public awareness and knowledge about environmental issues, and to provide the public with the skills needed to make informed decisions and to take responsible actions.

Eligible activities include, but are not limited to: designing, demonstrating, or disseminating of environmental curricula; assessing environmental and ecological conditions or specific environmental issues or problems; training or educating teachers, faculty, or related personnel; and fostering international cooperation in addressing environmental issues and problems in the U.S. and Canada or Mexico.

The sponsor strongly encourages applicants to demonstrate or disseminate existing curricula, although new projects will be considered if the applicant can demonstrate a need for them.

All proposals must also focus on one of the following: building State, local, or tribal capacity to develop and deliver quality environmental education programs; utilizing environmental education as a catalyst to advance State, local, or tribal education reform and improvement goals; educating teachers, students, parents, community leaders, and the public about human health threats from environmental pollution, especially as it affects children; educating teachers, faculty, or nonformal educators about environmental issues to improve their environmental education teaching skills (e.g., through workshops); educating students in formal or nonformal settings about environmental issues to encourage environmental careers; educating low income and culturally diverse audiences about environmental issues, thereby advancing environmental justice; and/or educating the public about environmental issues in their communities through community-based organizations or through print, film, broadcast, or other media.

RESTRICTIONS:

Eligible applicants are colleges and universities, local or tribal education agencies, state education or environmental agencies, nonprofit organizations, or noncommercial educational broadcasting entities.

The maximum award is \$250,000. Duration may be up to two years, except for grants of under \$5,000 which are limited to one year. Matching funds of twenty-five percent of the project's total cost are required, and may be met through cash or in-kind contributions. Funds may not be used for: construction projects; technical training of environmental management professionals; non-educational research and development; and/or environmental information projects that have no informational component. More than one proposal may be submitted, but only if the proposals are for completely different projects.

Application forms and guidelines are available. Application forms and guidelines can also be obtained from an additional world wide web address: <http://www.nceet.snre.umich.edu/grant.html>. The following individuals may be contacted for further information: EPA Region I (CT, ME, MA, NH, RI, VT): Maria Piric, 617-565-9447; EPA Region II (NJ, NY, PR, VI): Teresa Ippolito, 212-637-3671; EPA Region III (DC, DE, MD, PA, VA, WV): Bonnie Smith, 215-566-5543; EPA Region IV (AL, FL, GA, KY, MS, NC, SC, TN): Fred Thornburg, 404-562-8317; EPA Region V (IL, IN, MI, MN, OH, WI): Suzanne Saric, 312-353-3209; Region VI (AR, LA, NM, OK, TX): Jo Taylor, 214-665-2204; Region VII (IA, KS, MO, NE): Rowena Michaels, 913-551-7003; Region VIII (CO, MT, ND, SD, UT, WY): Cece Forget, 303-312-6605; Region IX (AZ, CA, HI, NV, American Samoa, Guam, Northern Marianas): Matt Gaffney, 415-744-1582; and Region X (AK, ID, OR, WA): Sally Hanft, 1-800-424-4EPA, 206-553-1207. Source: Federal Register (12/10/96) Vol. 61, No. 238, pp. 65105-17. (kal)

Keywords:

- Environmental Education
- Teacher Education
- International Education/Training
- Instructional Materials and Practices
- Ecology
- Environmental Studies
- Pollution Control

BIBLIOGRAPHY

- Albert, Steven; Enoté, James; and Webb, Kevin; eds., *The Zuni Resource Development Plan: A Program of Action for Sustainable Resource Development*, Zuni: New Mexico, 1995.
- Assistant Secretary, Bureau of Indian Affairs, *Secretarial Plan for the Use and Distribution of the White Mountain Apache Tribe Judgment Funds in Docket 22-H Before the United States Court of Federal Claims*, 10 December 1996.
- Cornell, Stephen, *Five Myths, Three Partial Truths, a Robust Finding, and Two Tasks*, Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, May 1994.
- Cornell, Stephen and Kalt, Joseph P. *Where's the Glue? Institutional Bases of American Indian Economic Development*, Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, February 1991.
- Public Choice, Culture, and American Indian Economic Development*, Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, July 1988.
- The Redefinition of Property Rights in American Indian Reservations: A Comparative Analysis of Native American Economic Development*, Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, May 1987.
- "Reloading the Dice: Improving the Chances for Economic Development on American Indian Reservations," in *What Can Tribes Do? Strategies and Institutions in American Indian Economic Development*. Los Angeles: University of California, Los Angeles, 1992.
- "Where Does Economic Development Really Come From? Constitutional Rule Among the Modern Sioux and Apache." Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, April 1993
- Craig, Jeneva A. and John W. Reid, "Human Resource Management Reform at White Mountain Apache Reservation," Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, April 1993.
- Director, Office of Tribal Services, White Mountain Apache Tribe, *Memorandum to U.S. Department of the Interior re: Results of Research Report of Judgment Funds to the White Mountain Apache Tribe of Arizona, in Docket 22-H, before the U.S. Claims Court*. Whiteriver, AZ: White Mountain Apache Tribe, 14 February 1996.
- DLA Financial, Inc, *The DLA Financial*, 3 (Spring/Summer 1996), 7-56.
- Briefing Book for DLA Financial Investment Seminar*, San Francisco, February 27-28, 1997.

- Emory, Georgia, *Easing the Equity Crunch on the Cheyenne River Sioux Reservation*. Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, April 1994.
- Freeman, Andrea and Moore, Marc L., *Finding True North: Using Compass Points for Guidance. A Project Selection Framework for the Northern Cheyenne Tribe of Montana*, Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, April 1995.
- Freeman, David F. and the Council on Foundations, *The Handbook on Private Foundations*, The Foundation Center, 1991.
- General Counsel, White Mountain Apache Tribe, *Memorandum: Docket 22-H Status*. Whiteriver, AZ: White Mountain Apache Tribe, September 1994.
- Gitlin, Martin W., *"Completing the White Mountain Apache Tribal Museum and Cultural Center,"* Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, May 1988.
- Goldstein, Edward, *"A Strategic Plan for the White Mountain Apache Cultural Center and Historic Site at Fort Apache,"* Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, May 1988.
- Jorgenson, Miriam, *Development Finance at the Standing Rock Sioux Indian Reservation: Assessing a Proposal for Economic Rejuvenation*, Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, February 1990.
- "Foundations for the Future: A Proposal for Government Reform at the White Mountain Apache Tribe,"* Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, June, 1991.
- Long, Jonathan W., *Building Connections: A Strategy to Integrate Resource Management*, Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, April 1994.
- "Sustainability through Restoration: Experiences of the White Mountain Apache Tribe,"* Watershed Conference Proceedings, 1996.
- Lupe, Ronnie, *The Challenges of Leadership and Self-Government: A Perspective from the White Mountain Apaches (Speech)*. Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, October 1992.
- Maturino, Teresa and Trevino, Elaine, *How Can the White Mountain Apache Tribe Attract, Produce and Retain Quality Tribal Managers?*, Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, April 1996.
- McSloy, Steven P., *"Back to the Future: Native American Sovereignty in the 21st Century,"* *New York University Review of Law & Social Change* XX, no. 2 (1993): 217-302.

Monrad, Marie D., *Native American Tribal Trust Funds: Expanding the Options for Tribal Control. A Report to the First Nations Financial Project*, Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, April 1988.

Singer, Joseph W, "Sovereignty and Property," *Northwestern University Law Review* 86, no. 1 (Fall 1991): 1-56.

Stevenson, Gelvin, *Investment Principles: What You Need to Know to Manage the Tribe's Investments*, Green Bay: Heritage Printing, 1994.

-----*The Investment Industry: What You Need to Know about the Players, Regulation, Fees & Other Pertinent Matters*, Green Bay: Heritage Printing, 1994.

-----*Evaluating and Monitoring Investment Advisers: What You Need to Know to Keep Your Investments on Track*, Green Bay: Heritage Printing, 1994.

Taylor, Jonathan B. *Negotiating a Vision: Principles of Comprehensive Resource Planning and a Planning Process for the White Mountain Apache Tribe*, Cambridge, MA: Harvard Project on American Indian Economic Development, John F. Kennedy School of Government, Harvard University, April 1992.

Tiller, Veronica, *American Indian Reservation and Trust Areas, 1996*, EDA, U.S. Department of Commerce, Copyright 1996

Transcript of Proceedings for Public Hearing in the Matter of: White Mountain Apache Judgment Fund, Docket 22-H, Cibecue: AZ, 26 June 1996.

Transcript of Proceedings for Public Hearing in the Matter of: White Mountain Apache Judgment Fund, Docket 22-H, Whiteriver: AZ, 27 June 1996

Utter, Jack, *American Indians: Answers to Today's Questions*, Lake Ann: National Woodlands Publishing Company, 1993.

White Mountain Apache Tribal Council, Resolution No. 11-95-354: *Distributing the 22-H Funds and Establishing a Perpetual and Permanent White Mountain Apache Land Restoration Fund*, 9 November 1995.

White Mountain Apache Tribal Council, Resolution No. 03-96-052: *Acknowledging Receipt and Review of the Results of Research Report of Judgment Funds, Prepared by the BIA*, 5 March 1996.

White Mountain Apache Tribal Council, Resolution No. 04-96-085: *Establishing Ineligibility for Distribution of 22-H Judgment Claims for Tribal Members Receiving Court of Claims Judgment Distributions While Enrolled with any Other Indian Tribe*, 11 April 1996.

White Mountain Apache Tribal Council, Resolution No. 06-96-129: *Establishing Cut-off Date for Receipt of Distribution of Judgment 22-H Funds*, 5 June 1996.

White Mountain Apache Tribal Council, Resolution No. 07-96-145: *Authorizing Repayment from Docket 22-H Funds of \$500,000 Loan for Litigation Expenses to FATCO*, 10 July 1996.

White, Robert H., *Tribal Assets: The Rebirth of Native America*. New York: Henry Holt & Co., 1990.

LIST OF INTERVIEWS

- Anderson, Hayden, Healthy Nations, White Mountain Apache Reservation, February 28, 1997
- Altaha, Lafe, Vice Chairman, at Tribal Headquarters, White Mountain Apache Reservation, January 24, 1997
- Baha-Walker, Margaret, Councilwoman, District III, at Tribal Headquarters, White Mountain Apache Reservation, January 24, 1997
- Brauchli, Bob, General Counsel, Legal Department, White Mountain Apache Reservation, January 24, 1997
- Dalton, Gina, Tribal Secretary, at Tribal Headquarters, White Mountain Apache Reservation, February 27, 1997
- Dazen, Romeo, Councilman, District I, at Tribal Headquarters, White Mountain Apache Reservation, January 23, 1997
- DeClay, Alvin, Councilman, District III, at Tribal Headquarters, White Mountain Apache Reservation, January 24, 1997
- DeHose, Judy, Councilwoman, District I, at Tribal Headquarters, White Mountain Apache Reservation, January 24, 1997
- Enote, Jim, Director, Zuni Conservation Project, March 12, 1997
- Ethelbah, Lona, Office Manager, Planning Department, White Mountain Apache Reservation, January 23, 1997
- Foster, Charles, Adjunct Lecturer in Public Policy, John F. Kennedy School of Government, Harvard University, March 7, 1997
- Gustafson, Curt, Editor, *Fort Apache Scout*, January 23, 1997
- Henry, Russell, Chair of Natural Resources Committee, FATCO, White Mountain Apache Reservation, January 24, 1997
- Jones, Keith, Tribal Environmental Planner, Planning Department, White Mountain Apache Reservation, January 23, 1997 and February 28, 1997
- Kane, Edwin, Tribal Treasurer, White Mountain Apache Reservation, February 27, 1997
- Kane, Edwin, Tribal Elder, White Mountain Apache Reservation, January 24, 1997
- Kessay, Preston, Building Project Inspector, Planning Department, White Mountain Apache Reservation, February 28, 1997

Kitcheyan, Ivan, Administrative Manager, Bureau of Indian Affairs Fort Apache Agency, White Mountain Apache Reservation, February 28, 1997

Letts, Chris, Lecturer in Public Policy, John F. Kennedy School of Government, Harvard University, March 6, 1997

Long, Jonathan Watershed Planner, at Tribal Planning Department, White Mountain Apache Reservation, January 24, 1997 and February 28, 1997

Lupe, Candy, Wetlands Planner, Tribal Planning Department, White Mountain Apache Reservation, February 28, 1997

Lupe, Ronnie, Chairman, at Tribal Headquarters, White Mountain Apache Reservation, January 24, 1997

Massey, Guy, Councilman, District IV, at Tribal Headquarters, White Mountain Apache Reservation, February 28, 1997

O'Hara, Charlie, Director of Tribal Planning, at Planning Department, White Mountain Apache Reservation, January 24, 1997 and February 27, 1997

Parker, Silvia, Records Department, at Tribal Headquarters, White Mountain Apache Reservation, January 23, 1997

Reinhold, Dave, Forest Manager, Bureau of Indian Affairs Fort Apache Agency, White Mountain Apache Reservation, February 28, 1997

Riley, Ramon, Director of Cultural Center, at Tribal Headquarters, White Mountain Apache Reservation, January 24, 1997

Santomenna, Dave, Healthy Nations, White Mountain Apache Reservation, February 27, 1997

Stringer, Charlie, Tribal Attorney, Legal Department, White Mountain Apache Reservation, January 24, 1997 and February 27, 1997

Tate, Herbert, Councilman, District IV, at Tribal Headquarters, White Mountain Apache Reservation, February 28, 1997

Vigil, Donna, Director, Health Education Department, at White Mountain Apache Reservation, February 28, 1997

Vinson, Greg, Range Conservationist and Rancher, Planning Department, White Mountain Apache Reservation, January 23, 1997

Waters, Joe, Grant Writer, Planning Department, White Mountain Apache Reservation February 27, 1997