

August 1, 2025

The Honorable Doug Burgum Secretary U.S. Department of the Interior 1849 C Street NW Washington, D.C. 20240

via email: execsec correspondence@ios.doi.gov

RE: Noticing Potential Need for Tribal Consultation on Federal Regulatory Reforms

Dear Secretary Burgum:

On behalf of the undersigned Tribal organization members of the Coalition for Tribal Sovereignty (CTS), we write in response to the Department of the Interior's (DOI) publicly noticed request for information (RFI) on potential regulatory reforms. We request that DOI engage in meaningful government-to-government Tribal consultation on any regulatory reforms recommended during the RFI that *may* impact Indian Country. We also ask that DOI engage with Indian Country to help identify regulatory changes under consideration that may affect us.

As a general principle, Tribal Nations are in favor of reducing unnecessary regulatory burdens and inefficient bureaucratic processes, so long as doing so does not hinder the exercise of Tribal sovereignty, our ability to care for our citizens and communities, or the United States' delivery on its trust and treaty obligations. In this case, DOI's RFI requested assistance in "identifying existing regulations that can be modified or repealed. . . to ensure that DOI administrative actions do not undermine the national interest and that DOI achieves a meaningful reduction in regulatory burdens." This is a commendable goal if carried out properly.

Many federal regulations impacting Tribal Nations were originally promulgated without Tribal consultation, and Tribal governments, Tribal organizations, and Tribal citizens are frequently disproportionately impacted by federal regulatory changes. Therefore, we respectfully request that—now that the public comment period has closed—DOI publish a list of regulations it is considering amending so that Tribal Nations may identify areas of interest or concern. We also request that DOI remember and carry out its trust and treaty obligations to engage in government-to-government consultation with Tribal Nations on any proposed federal action that may impact Indian Country. Working together, as sovereigns, we can achieve consensus on how to move forward in a manner that protects Tribal sovereignty and delivers on United States trust and treaty obligations while also reducing administrative burdens and inefficiencies in alignment with Administration goals.

Sincerely,

² 90 FR 21504 (May 20, 2025).

¹ CTS consists of more than 35 Tribal organization members. A CTS briefing paper on the formation and messaging of CTS can be found here, and more information about CTS can be found on our website here.



Affiliated Tribes of Northwest Indians (ATNI)

American Indian Higher Education Consortium (AIHEC)

Inter Tribal Association of Arizona (ITAA)

National Association of Tribal Historic Preservation Officers (NATHPO)

National Congress of American Indians (NCAI)

National Indian Child Welfare Association (NICWA)

National Indian Head Start Directors Association (NIHSDA)

National Indian Health Board (NIHB)

Native American Rights Fund (NARF)

Rocky Mountain Tribal Leaders Council (RMTLC)

United South & Eastern Tribes Sovereignty Protection Fund (USET SPF)

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