

Exhibit A



COALITION OF LARGE TRIBES

Blackfeet Nation • Cheyenne River Sioux Tribe • Confederated Tribes of the Colville Reservation • Confederated Tribes of the Warm Springs Indian Reservation of Oregon • Crow Creek Sioux Tribe • Crow Nation • Eastern Shoshone Tribe • Fort Belknap Indian Community • Hopi Tribe • Mandan, Hidatsa & Arikara Nation • Mescalero Apache Tribe • Muscogee (Creek) Nation • Navajo Nation • Northern Arapaho Tribe • Northern Cheyenne Tribe • Rosebud Sioux Tribe • San Carlos Apache Tribe • Shoshone-Bannock Tribes • Shoshone-Paiute Tribes of the Duck Valley Indian Reservation • Sisseton Wahpeton Sioux Tribe • Spirit Lake Nation • Spokane Tribe • Standing Rock Sioux Tribe • Ute Indian Tribe • Ute Mountain Ute Tribe • Walker River Paiute Tribe

December 12, 2025

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

Dear Secretary Burgum:

On behalf of the Coalition of Large Tribes, representing the interests of the more than 50 reservations of 100,000 acres or more, I write to express our steadfast appreciation your continued commitment to tribal nations, and to ask for your continued partnership in celebrating America's 250th Anniversary by lifting up the National Mammal and our relative, the bison.

We raise three immediate concerns with you: (1) our request for Indian Affairs to lead the Bison Working Group; (2) our request that you curtail the unnecessary targeting of bison and federal land leasing; and (3) our request to meet with COLT leaders to inform your consideration of IBLA Appeals MT-010-22-01, MT-010-22-02 and MT-010-22-03 following your December 9 assumption of jurisdiction.

First, as many long-time DOI personnel working on bison matters have made transitions in recent months, including the co-chairs of the Bison Working Group, we note that Indian Affairs' leadership on bison matters for the Department has been expert and steady. We request that you appoint Troy Heinert, Chief, Department of the Interior Office of Trust Services, Division of Natural Resources' Bison Management Branch, as Chair of the Bison Working Group. No one at DOI knows more about bison than Mr. Heinert. As a citizen of the Rosebud Sioux Tribe, he understands COLT tribes' perspectives and would be an excellent leader for the Department's ongoing bison efforts.

Second, we are aware that the Montana cattlemen with the Montana Congressional delegation, for whom we have the utmost respect, recently sent you a letter opposing leasing BLM land for bison grazing. Montana's outdated and hyperbolic fear of bison is confusing and concerning. We do not have a position on any one entity's federal leases, but we do take a very strong position against efforts to exclude bison from or to revoke federal leases for bison grazing and feel compelled to speak up and to clarify some inaccurate statements.

We Support Cattle and Bison Ranchers – Buy American Beef and Bison Meat. We can support cattle and bison. Most of our reservations have significant grass and cattle economies.



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We also feel the pinch in the cattle economy right now. We support the federal government buying American beef and bison meat - and supporting American cattle and bison producers and herds.

Bison Do Not “Remove” Federal Land from Production – Actually They Increase the Productivity of the Land.

- **Bison Increase Grass Health by Over 100% - Increasing Drought Resiliency of Federal Lands.** Leasing to bison operations is smart business for the federal landowner. A 30-year [study](#) by Kansas State University showed that sustainably managed cattle increased the diversity of native plants by about 50%, and sustainably managed bison increased the diversity of native plants by over 100%. The study also found bison grazing contributed to increased resiliency to drought.
- **Bison Improve Ecosystems Including for Wild Game on Federal Lands.** When bison roll on their backs they create depressions in the earth, or wallows, that collect water supporting unique prairie plants, amphibians, and bird species. Their grazing patterns promote diverse vegetation composition and heights, accommodating various animals and creating unique habitat. Even their fur is crucial for the nests of a variety of prairie birds, improving nest success. They can cohabit with other grasslands animals and mammals easily.

Bison Are Essential to National Food Security

- **Bison Feed Our Economies and Our People.** Bison feed and nourish our people. During both COVID when supply chains broke down, and now again recently during the federal government’s shutdown we can provide for our people and surrounding communities.
- **Bison Are More Resilient to Bad Weather.** South Dakota State University released its [study](#) of the extreme October 2013 Atlas blizzard. Nearly 40,000 cattle died. Only 40 bison died. This was 223x the expected death rate for cattle, but only 6.7x for bison. With blizzards and extreme weather in the Great Plains anticipated to increase substantially by 2050, it led the paper to conclude “Bison appear to be resilient to blizzards and blizzards are expected to increase due to climate change, therefore, bison may offer viability for ranchers in the face of blizzards and more variable weather.”

Tribal Ranchers - and Bison - Have Been Legally Excluded from Federal Leasing. Until just last year, Tribes and Tribal Ranchers were excluded from USFS/National Grasslands for federal



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grazing leases. USDA regulations held that our land – trust lands – were considered “federal lands” and their use excluded us from leasing additional federal lands (“base property”). Bison operators continue to struggle obtaining federal leases - with challenges to their classification as livestock versus wildlife and generational preferences built in for cattle.

Montana Bison Are Brucellosis-Tested and Brucellosis-Free. There is no documented case of bison transmitting Brucellosis to cattle. Montana is considered brucellosis free, this constant cattle industry talking point is fear-baiting. Dr. Tahnee Szymanski, Montana State Veterinarian, said in an [interview](#) with the Daily Montanan, “The only population of infected animals in Montana is Yellowstone National Park...any other domestic bison or cattle herd in the state of Montana is considered to be free of brucellosis.”

Bison Are Our Relatives – Our Fates Are Intertwined. Finally, and most importantly, bison are our relatives. We have ancestral and spiritual obligations to care for them. As they do us. Our success as a people is dependent on their success. Our history, our futures, and our fates are intertwined.

We thank you again for your leadership with tribal nations while Governor of North Dakota and for your service as Secretary. As a North Dakotan, you understand the importance of grasslands and you appreciate the role bison play for the health of our grasslands, our tribes and our Nation. COLT leaders are happy to meet with you any time to discuss our perspectives and hope to be a helpful resource to the Department on any bison matters. And in that vein, we are aware of your assumption of jurisdiction over the Phillips County, Montana BLM lease appeals. We understand and respect the advocacy you have already received from Governor Gianforte and the Montana Delegation on this matter. We also believe that receiving information about our tribal perspective would also be helpful to you. We request to meet with you, Mr. Scott Davis and Mr. Troy Heinert as soon as practicable. I will be in Washington, DC Monday and Tuesday December 15-16 and available in person, or virtually thereafter. We would appreciate some time to discuss tribal implications that could flow from the BLM appeals, although no direct tribal interests are at issue therein. Thank you.

Wopila,

Signed by:

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J. Garret Renville, Chairman
Coalition of Large Tribes; Chairman, Sisseton-Wahpeton
Oyate of the Lake Traverse Reservation, South Dakota

Exhibit B



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January 23, 2026

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

Re: COLT Concerns and Intent to Appeal January 16, 2026 BLM NOTICE OF PROPOSED DECISION regarding modified Montana grazing permits; Request to Meet

Dear Mr. Secretary:

I write as Chairman of the Coalition of Large Tribes (COLT)—an intertribal organization representing the interests of the more than 50 tribes with reservations of 100,000 acres or more, encompassing more than 95% of the Indian Country lands and more than half the Native American population—to express COLT’s concerns regarding BLM’s January 16, 2026 Notice of Proposed Decision following your assumption of jurisdiction over administrative appeals challenging the Bureau of Land Management’s (BLM) July 28, 2022, Final Decision that modified grazing permits held by American Prairie to authorize a change in kind of livestock from cattle only to cattle and/or bison on BLM-administered grazing allotments in Phillips County, Montana. Simply put, we will be timely appealing the Proposed Decision because COLT member tribes are very much the interested public and we have concerns about the Proposed Decision’s unintended and negative consequences for tribal bison herds. As the Proposed Decision is currently written, it is unlikely that any tribal buffalo herd would ever be eligible for BLM grazing.

We have to file our appeal papers by January 29, 2026 under BLM’s rules, but we also hope to meet with you and Deputy Assistant Secretary Karen Budd-Falen, Assistant Secretary Billy Kirkland, PDAS Janel Brodreck, Mr. Scott Davis and Mr. Troy Heinert, each of whom we understand to have expertise to bring to bear, to discuss COLT’s concerns as soon as you might be available.

Briefly, our concerns are about the policy determinations contained in the Proposed Decision and the process—or lack thereof—associated with the Proposed Decision. First, we note that the definitions discussed at length in the Proposed Decision are not found in the Taylor Grazing Act. This is classic regulation by enforcement, which COLT strongly opposes. Second, no tribal consultation occurred with respect to these new definitions, yet they will profoundly



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impact tribes and tribal herds if the definitions stand and make tribal bison herds ineligible to graze on BLM land.

Had there been any tribal consultation about proposed new definitions under the Taylor Grazing Act, COLT and our member tribes and others would have no doubt explained that bison are multi-functional in our communities—serving livestock, conservation and cultural roles. They cannot be pigeonholed into just one category.

As I shared in my December 12, 2025 letter to you about bison, bison actually increase the productivity of the land on which they graze.¹ And, bison are essential to national food security, and especially for our large land base tribal communities.²

We have many challenges with grazing on trust land, so grazing on BLM land will be increasingly crucial as we grow tribal herds. Several tribes were in active negotiations on grazing leases with BLM prior to the Proposed Decision.

¹ **Bison Increase Grass Health by Over 100% - Increasing Drought Resiliency of Federal Lands.** Leasing to bison operations is smart business for the federal landowner. A 30-year [study](#) by Kansas State University showed that sustainably managed cattle increased the diversity of native plants by about 50%, and sustainably managed bison increased the diversity of native plants by over 100%. The study also found bison grazing contributed to increased resiliency to drought.

Bison Improve Ecosystems Including for Wild Game on Federal Lands. When bison roll on their backs they create depressions in the earth, or wallows, that collect water supporting unique prairie plants, amphibians, and bird species. Their grazing patterns promote diverse vegetation composition and heights, accommodating various animals and creating unique habitat. Even their fur is crucial for the nests of a variety of prairie birds, improving nest success. They can cohabit with other grasslands animals and mammals easily.

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We believe that if we meet, we can share important perspectives on why bison should absolutely be eligible for BLM grazing. COLT takes no position on the leases underlying the Proposed Decision. Our concerns center on new regulatory definitions that are being implemented without any tribal consultation or input and that fly in the face of our lived experience with our bison relatives who serve so many roles in our communities.

Please let me know when we can meet. My cell is (605) 268-0589 and my email is chairman@swo-nsn.gov. I appreciate your time and consideration. As always, thank you for your leadership.

Respectfully,


Signed by:
EDB3CD26B0764EE...

J. Garret Renville, Chairman
Coalition of Large Tribes; Chairman, Sisseton-Wahpeton
Oyate of the Lake Traverse Reservation, South Dakota