

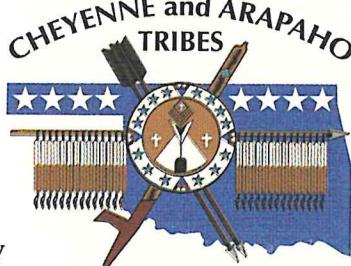
OFFICE OF THE GOVERNOR

Reggie Wassana

Governor

Hershel Gorham

Lieutenant Governor



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

Sonya Germann, State Director
Montana/Dakotas BLM State Office
5001 Southgate Drive
Billings, MT 59101

RE: Opposing BLM Notice of Proposed Decision to APR re Buffalo Leases Dated January 16, 2026

Dear Secretary Burgum and Director Germann

I am the Governor of the Cheyenne and Arapaho Tribes (Tribe) and on behalf of my Tribe, offer the following comments related to the Bureau of Land Management (BLM) Notice of Proposed Decision to rescind 2022 approvals for bison grazing on federal allotments in Phillips County, Montana, held by American Prairie (APR) dated January 16, 2026.

The Cheyenne and Arapaho Tribes manage its own buffalo herd which includes over 400 head of buffalo. As a Great Plains tribe, buffalo are sacred to us and have cared for us since time immemorial, and now is the time for us to care for them. Thus, the Cheyenne and Arapaho Tribes oppose the Proposed Decision because it demonstrates a federal deference against protecting the grasslands of Montana's Great Plains which is also home to the Assiniboine Sioux, Blackfeet, Chippewa Cree, Crow, Gros Ventre, Salish & Kootenai, Little Shell Chippewa, and Northern Cheyenne Tribes. The overall impact of the Proposed Decision does not support self-determination and sovereignty for tribes and hinges on the BLM's own definition of livestock which is extremely narrow and goes against the intent of the Taylor Grazing Act (TGA) to use broad discretion in authorizing the BLM to issue grazing permits for livestock.

The Proposed Decision is not sufficient nor does it grant an opportunity for the APR to review its existing programs and to update and amend its programs and values to ensure that they align with the TGA. The Proposed Decision is not comprehensive and its reliance on the BLM's definition of livestock in absence of the TGA not providing a livestock definition keeps one important issue that remains uncertain. That issue is who will ensure that the grasslands of Montana's Great Plains are preserved.

We appreciate the Secretary's experience of working with Tribal nations, knowledge of Tribal sovereignty, the strong relationship he had with the North Dakota Tribes, and his appreciation of Teddy Roosevelt and buffalo. North Dakota has a very balanced relationship with cattle and bison.

As such, we are hopeful the Secretary can intervene to prevent Montana's imbalance from spreading.

Buffalo are the best land managers; they increase the biodiversity of the grasslands by over 100%. It is unacceptable that after a century of trying to recover the population, the federal government would still seek to keep any buffalo off our public lands. Buffalo created a mosaic of habitats and provided influences on the landscape that hundreds of species evolved with and depended on. Grazing, wallowing, trampling decomposition and defecating are just a few. Buffalo are the best choice for land managers on behalf of the American landowner.

Decision Ignores Tribal Management Practices. At Cheyenne and Arapaho, we are committed to treating buffalo as the sacred animal that they are, managing them lightly, and replicating wild ecosystems as much as possible. We have gone through a long learning process to provide this to our relatives. We strongly advocate that all managers of buffalo herds raise their animals as wild as possible. If you exclude a herd that is being managed as such or "treated as wild," that rejects Tribal indigenous buffalo management practices.

Importance of Gifting Animals for Genetic Diversity. While we take no position on the APR bison lease, their herd has been gifting animals to tribal herds for many years. Because the federal government nearly decimated the bison population, having herds that are more conservation-focused is essential to keep the other herds healthy through animal exchanges to maintain as much genetic diversity as possible.

No tribal consultation. As the Governor of North Dakota, the Secretary was respectful of Tribal sovereignty and valued the importance of Tribal consultation. The BLM's own website states "At the Bureau of Land Management, which is a part of the Interior Department, honoring our nation-to-nation relationship with Tribal Nations, strengthening Tribal sovereignty and self-governance, and upholding the trust and treaty responsibilities are paramount to fulfilling our mission." In addition, the BLM's website states "we are reaffirming our commitment to robust consultations as the cornerstone of federal Indian policy." The Proposed Decision has dramatic impacts on Tribal nations and our century long drive to restore the buffalo population that the Federal government tried to eradicate. Significant tribal consultation is needed before any final decisions is made by BLM.

It is our sacred duty to fight for and protect our relatives, the buffalo.

Thank you,



Reggie Wassana

Governor, The Cheyenne and Arapaho Tribes

CC:

Cheyenne River Sioux Tribal Buffalo Authority

Billy Kirkland, Assistant Secretary – Indian Affairs

Janel Broderick, Principal Deputy Assistant Secretary – Indian Affairs

Scott Davis, Deputy Assistant Secretary – Indian Affairs