



Tribal Leader Talking Points
for
DOI Consultation on
the *DOI Strategic Plan (Fiscal Years 2026-2030)*
Updated: June 11, 2025

<p>Using this Document:</p>	<p>The purpose of this document is to provide information that can be quickly reviewed and utilized by Tribal leaders in the development of their oral comments (at a consultation session) and/or written comments (submitted after a consultation session). This document is not a script to be read. And while this document seeks to provide information on critical issues related to this consultation, it is not intended to be an exhaustive list of everything important to Indian Country, and Tribal leaders are encouraged to supplement the information here with their own priorities, data, and testimonials.</p> <p>For ease of use, this document is divided into two sections:</p> <ul style="list-style-type: none">● Section 1: Background. Contains information and context on this government-to-government consultation. <i>No talking points in this section.</i>● Section 2: Talking Points. Contains talking points for your consideration specific to the issues raised in the consultation.
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SECTION 1: BACKGROUND	
Who:	<i>Department of the Interior (DOI)</i>
What:	<i>Tribal Consultation on DOI’s Strategic Plan (Fiscal Years 2026-2030)</i>
When:	<p>June 17, 2025 at 3:00 p.m. EDT (East Coast Tribal focus) Zoom: https://www.zoomgov.com/meeting/register/8geOldpcRUmmVO24AI6kcA</p> <p>June 18, 2025 at 3:00 p.m. EDT (ANC focus) Zoom: https://www.zoomgov.com/meeting/register/eNp2PDlySiapR0VTncAW9Q</p> <p>June 24, 2025 at 3:00 p.m. EDT (West Coast Tribal focus) Zoom: https://www.zoomgov.com/meeting/register/AxkiZxq0Q3ORw2pJ_41HoQ</p> <p>June 26, 2025 at 3:00 p.m. EDT (Native Hawaiian focus) Zoom: https://www.zoomgov.com/meeting/register/EZIEs_fQQ1qVj2I_65kaYg</p>
Reason for Tribal consultation:	<p>The Government Performance and Results Modernization Act of 2010 (GPRAMA) requires federal agencies to publish a strategic plan one year after a presidential inauguration and to annually track the agencies performance in implementing the plan.</p> <p>DOI is preparing to release its Fiscal Year (FY) 2026-2030 Strategic Plan in October 2025. The strategic plan outlines DOI’s goals, objectives, and strategies for the next four years. The FY 2026-2030 Strategic Plan may look a bit different than in years past as it will be more streamlined in length and presented at a very high level. Federal agencies will be developing shorter strategic plans to support the Administration’s goal of providing clear and concise documents to the American public. DOI is committed to working in partnership with Tribal Nations to ensure the outcomes in the plan are meaningful and valuable to Tribal communities.</p>
DOI’s framing questions for Tribal consultation:	<ol style="list-style-type: none"> 1) What changes would you like to see incorporated into the strategic goals, strategic objectives, or planned strategies in the FY 2026-2030 Strategic Plan? 2) What performance measures would you like to see the Department track?

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	3) Are there any questions you would like to see the Department pursue and learn about to become more efficient and effective?
Written comment information:	DOI states that written comments will be accepted for “approximately 30 days” after the last scheduled consultation session. Thus, comments should be submitted by July 25, 2025 and can be sent to: consultation@bia.gov .
More info:	<i>Dear Tribal Leader Letter</i> (available at: https://shorturl.at/fhuSg) <i>DOI Draft Strategic Plan</i> (available at: https://shorturl.at/7FMD2)

SECTION 2: TALKING POINTS	
How to use this section:	<p>This section contains suggested talking points, but it does not discuss in detail recommended changes to specific provisions of the document being consulted on.</p> <p>This section is organized around the three framing questions provided by DOI for this consultation. Each framing question appears in bold with proposed talking points appearing as bullets underneath the corresponding question.</p> <p>This section is not intended to be a script, but it is meant to convey useful information in formulating your own oral and/or written comments.</p>
DOI Framing Question #1: What changes would you like to see incorporated into the strategic goals, strategic objectives, or planned strategies in the FY 2026-2030 Strategic Plan?	
INTRODUCTORY TALKING POINTS:	
<ul style="list-style-type: none"> ❖ <i>Expand inclusion of Tribal Nations throughout the Strategic Plan:</i> <ul style="list-style-type: none"> ➤ <i>We acknowledge that DOI’s draft Strategic Plan does reference Tribal Nations and, in particular, that Objective 4.1 focuses on trust and treaty obligations to Tribal Nations.</i> ➤ <i>However, given the role DOI plays in the ongoing fulfillment of the United States’ trust and treaty obligations to Tribal Nations and our citizens and Tribal communities, more could and should be done to prioritize its legal responsibilities to Indian Country within DOI’s strategic objectives.</i> <ul style="list-style-type: none"> ■ <i>The four previous versions of DOI’s strategic plan—including the plan developed during President Trump’s first term—each included at least one entire strategic goal (or mission goal, as they were termed) dedicated to Indian Country. And the version of DOI’s strategic plan currently in place lists its <u>first</u> strategic goal as promoting “well-being, equity, and justice for Tribes, American Indians, [and] Alaska Natives.” The drafters for these documents dedicated significant space to the government-to-government relationship between the United States and Tribal Nations, reflecting its significance and scope.</i> 	

- *The draft version of DOI’s strategic plan has no strategic goal dedicated to Indian Country and only mentions Tribal Nations in the title of a single objective. While we appreciate that Strategic Objective 4.1 focuses on trust and treaty obligations, the reality is that our Tribal Nations and citizens and Tribal communities deserve more focus and priority within this document. Our placement in this document should properly reflect our status as sovereigns and the United States’ trust and treaty obligations to us.*
- *At a minimum, there is a need to include more information about trust and treaty obligations and commitment to promoting the exercise of Tribal sovereignty, including by acknowledging and protecting cultural and other resources.*
- ❖ *Update terminology to accurately reflect Tribal Nations’ status as sovereign governments rather than referring to individual Native Americans:*
 - *Refer to “Tribal Nations” rather than “Native Americans,” as the United States has government-to-government relationships with Tribal Nations, and Tribal Nations possess inherent sovereignty as governmental units. (This terminology should be updated in Strategic Objectives 1.1, 2.2, 2.3, 3.1, 3.2, 3.3, 4.1, and 4.3.)*
 - *Strategic Objective 3.1 states that DOI “recognizes sovereignty and rights of Native Americans,” but this is legally incorrect. Only Tribal Nations have sovereignty and the sentence should reflect recognition of “Tribal sovereignty and rights.”*
- ❖ *Ensure that Tribal realities are incorporated into larger strategic goals:*
 - *The draft document repeatedly references “conservation” as one of its goals, which is appreciated and sometimes aligns with Tribal priorities. However, it is important to always note that conservation must contemplate Tribal cultural importance as well, and that the two should be listed together when possible.*
 - *The draft document repeatedly references “American heritage” but fails to recognize that much of the cultural heritage of the United States belongs to or is directly connected to Tribal Nations and our people, lands, and histories.*
 - *The draft document talks about resources primarily from an economic perspective, including discussing their monetary worth. In some instances, doing so is inappropriate given that significant amounts of land are Tribal religious sacred sites and are thus irreplaceable.*

TALKING POINTS on SPECIFIC PROVISIONS of DOI's Strategic Plan (FY 26-30):

**DOI's Draft Strategic Goal 1:
Restore American Prosperity**

Strategic Objective 1.1: American energy lowers costs and increases affordability

Proposed talking points:

- ❖ *DOI mentions its intention to promote energy growth by “expediting leases and streamlining and cutting regulations while promoting conservation.” In implementing these plans, we urge DOI to fully take into account how these changes will impact Indian Country. Many of these impacts have been discussed in other DOI consultation sessions, but it is worth noting that, for example:*
 - *The National Environmental Policy Act (or NEPA) and Section 106 National Historic Preservation Act processes are important tools for ensuring Tribal Nations have a seat at the table in federal decision making that affects us. The proposed expedited timelines will result in significant and irreparable harm to Tribal Nations’ federally protected natural and cultural resources that Tribal Nations rely on for agricultural, subsistence, religious, and ceremonial purposes.*
 - *Additionally, it is critical to note again that any changes that are made to leasing processes or other regulations, in no way alter the United States’ legal requirement to consult with Tribal Nations on actions that impact our territories, culture, citizens, communities, or rights. These consultation rights are, in part, carried out through NEPA and Section 106.*
- ❖ *Streamline approval for leases and HEARTH Act regulations on Tribal lands, promote and expedite Indian Land Consolidation processes, and preserve the Indian Loan Guarantee Program. These actions would help finance and facilitate Tribal economic and business development on Indian Country lands.*

Strategic Objective 1.2: Americans benefit from strategic use of the country’s natural resources

Proposed talking points:

- ❖ *None*

Strategic Objective 1.3: The country is positioned to use our natural resource assets for the future

Proposed talking points:

- ❖ *Map, identify, and inventory current and future resources, coordinating with the Department of Commerce and National Telecommunications and Information Administration (NTIA) to expand the number of rural Native areas that currently have no addresses and consequently can't access broadband and otherwise become more accessible for development.*

**DOI's Draft Strategic Goal 2:
Ensure National Security Through Infrastructure and Innovation**

Strategic Objective 2.1: Interior resources protect people and property

Proposed talking points:

- ❖ *We support efforts to protect our cultural resources and sacred sites.*
- ❖ *DOI's efforts to strengthen law enforcement on public lands need to include improved enforcement of trespass and vandalism regulations on trust lands. Trespassers vandalize cultural and sacred sites, damage or destroy Tribal natural resources, and/or deplete grazing land or overgraze the land, leading to significant damage. And while trespass regulations need to be strengthened to be more effective, the shortage of officers means what is already on the books isn't being enforced.*
- ❖ *DOI's efforts to improve safety along Tribal territorial boundaries near international borders should do so only after Tribal consultation with and consent from the Tribal Nations that control the territory. DOI must not build up police forces in Tribal jurisdictions without Tribal consent.*

Strategic Objective 2.2: Infrastructure investments and modernization serve the public

Proposed talking points:

- ❖ *We support DOI's commitment to "upgrade key infrastructure" such as "Interior-funded schools" and to "work with Native Americans to improve school facilities and expand access to broadband internet, supporting high quality learning environments." However...*
- ❖ *In order to accomplish this, there will need to be a full workforce within the schools and sufficient program funding to teach within and to maintain the facilities. Without staffing and program funding, any improvements now will just become decrepit again due to an inability to properly use and care for them.*

- ❖ *DOI should utilize Buy Indian Act procurement procedures in awarding contracts for infrastructure development, etc., and purchase Native products and use Indian labor as prescribed by the Buy Indian Act.*

Strategic Objective 2.3: The country’s water supply is clean and meets our need

Proposed talking points:

- ❖ *We support the plan’s goal to “work with tribes to identify opportunities to transfer water assets to Native Americans to strengthen tribal sovereignty and build capacity for water resource management.”*
- ❖ *Water data needs to be made available for Tribal Nations, in addition to states, counties, and local jurisdictions. There has, unfortunately, been at least one case where a U.S. Geological Survey (USGS) dashboard on water reservoir levels removed data essential for a Tribal Nation’s irrigation projects and management of their agricultural resources. This issue could have been easily avoided if Tribal Nations were involved in the planning process.*
- ❖ *Any data should include data on land under Tribal jurisdiction, and should not only list data by county or state. Doing so will ensure that Tribal governments and citizens can more effectively and efficiently utilize the data to produce positive outcomes.*

**DOI’s Draft Strategic Goal 3:
Enjoy Our Natural Resources While Ensuring They Remain Sound and Sustainable**

Strategic Objective 3.1: Lands and waters provide opportunities for recreation and traditional use

Proposed talking points:

- ❖ *We support DOI’s statement that “the Department also recognizes sovereignty and rights of Native Americans to access these lands for traditional uses” and that “Native Americans will have access for traditional use, including hunting, fishing, and visiting sacred sites.”*
- ❖ *While increasing accessibility to public lands is good, we note that sometimes Tribal Nations need the public’s access to be limited temporarily or permanently for religious practices or privacy, and encourage dialogue between DOI and Tribal Nations to achieve this outcome.*
- ❖ *DOI plans to promote lawful hunting and fishing and improve access to public lands by upgrading trails and recreation facilities. This should be implemented in coordination with Tribal Nations with rights and/or interests in those lands.*
- ❖ *DOI’s plans under this objective should, when possible, utilize Buy Indian Act procurement contracts to accomplish upgrades. DOI should also negotiate with Tribal*

Nations to improve management of the lands, including expanding opportunities for Tribal Nations to enter into co-management and similar agreements.

Strategic Objective 3.2: Lands, waters, and American heritage are protected and conserved

Proposed talking points:

- ❖ *We support the statement in this Objective that: “By supporting the repatriation of cultural items to Native Americans, the Department will honor ancestral rights and strengthen connections to heritage.”*
- ❖ *We support the statement “[t]he Department will work with local communities and tribal nations to restore historic place names, honoring cultural significance.” However...*
- ❖ *Efforts to restore historic place names and honor cultural significance should include Tribal consultation.*
- ❖ *Additionally, plans to promote tourism in Tribal communities will continue to benefit from NATIVE Act grants to help enhance historic places, honor Native culture, support repatriation of cultural items, honor ancestral rights, and strengthen connections to tribal culture and heritage.*
- ❖ *TDOI should consult with Tribal Nations to coordinate and partner on plans to commemorate the early treaties during its planning for the 250th anniversary of the signing of the Declaration of Independence.*

Strategic Objective 3.3: Restore lands and waters

Proposed talking points:

- ❖ *We support DOI’s commitment to work with “Native Americans to restore lands damaged by extreme weather, hazardous waste, accidents, and other emergencies.” However...*
- ❖ *DOI should also use Native knowledge for better stewardship of lands and waterways such as utilizing traditional fire, flood, and drought planning to prevent emergencies from happening in the first place.*
- ❖ *DOI should prioritize infrastructure investment on Tribal lands, including water infrastructure, because not only are these investments good for economic development, but because they also contribute to DOI’s fulfillment of trust and treaty obligations.*
- ❖ *DOI mentions engaging in co-management with Tribal Nations to achieve this objective, which we support. But DOI should engage with Tribal Nations to find additional mechanisms and resources to support Tribal Nations exercising increased*

governance and control over traditional and culturally significant lands and waters. Co-management services should be supported by funding.

Strategic Objective 3.4: Species and natural resources are protected

Proposed talking points:

- ❖ *Work with Tribal Nations to identify opportunities for co-management of natural resources.*
- ❖ *Ensure “local knowledge” includes consultation with local Tribal Nations and the incorporation of any shared Traditional Ecological Knowledge (TEK) into natural resource management plans and actions, including the management of invasive species, habitat restoration, and mixed land management practices.*

**DOI’s Draft Strategic Goal 4:
Collaboration and Coordination Results in Better Outcomes for the Country, States, and the People**

Strategic Objective 4.1: Uphold trust and treaty responsibilities to American Indian Tribes, Alaska Natives, and the Native Hawaiian Community

Proposed talking points:

- ❖ *We support DOI’s commitment to building “meaningful government-to-government relationships” and to engaging in “regular consultation” with Tribal Nations.*
- ❖ *DOI states it is a priority to “facilitate collaboration and cooperation across the Federal government” to expand “shared management of land” and to manage trust assets for beneficiaries. In order to achieve these goals, adequate staffing and program funding are required.*
 - *For example, many Tribal farmers need to obtain an appraisal and Title Status Report from BIA for their USDA loans. This process can take weeks to months to years, which has real consequences. In agriculture, a delay of a few weeks waiting for documents can mean putting seed in the ground at a sub-optimal time or missing the opportunity to buy the healthiest livestock. This results in decreased revenue for individuals and their local economies.*
- ❖ *In order to “facilitate collaboration and cooperation across the Federal government” in the agriculture space, there needs to be efforts made to improve collaboration between the BIA and USDA. Field offices from the two agencies often don’t have a good understanding of each other and how their programs interact, which leads to substantial inefficiencies when implementing programs. Additionally, BIA and USDA have duplicate and sometimes conflicting regulations that interfere with land management for agricultural purposes, which also need to be addressed.*

- ❖ *DOI states it will increase “investment in education and jobs programs” but doing so will require funding. Currently, there is a proposed \$161 million cut to Tribal Colleges and Universities, which seems to indicate that the Administration’s priorities are inconsistent with this proposed Strategic Objective.*

Strategic Objective 4.2: Work collaboratively with states, local communities, U.S. Territories, and Freely Associated States

Proposed talking points:

- ❖ *This strategic objective mentions a number of governments that DOI works with to “achieve common, shared goals” but does not include “Tribal governments” in its text.*
- ❖ *In order to grow public-private partnerships, DOI should work collaboratively with Tribal Nations to develop solutions and then follow up by providing meaningful technical assistance to implement those solutions. Tribal and Tribal-focused business development and procurement technical assistance providers can also play roles in fulfilling this objective.*

Strategic Objective 4.3: Provide reliable, valuable science information to our partners

Proposed talking points:

- ❖ *Data sharing plans should include plans for reporting data on land under Tribal jurisdiction and for making data available to Tribal Nations. Additionally, to encourage agricultural development, there needs to be improved data sharing between DOI and USDA. DOI has some very useful geospatial maps showing different types of Tribal land, but it lacks basic information that would be invaluable for development, such as the number of acres of land under Tribal jurisdiction that are currently being used for agricultural production. All data sharing plans should take into account Tribal ownership of their own data, lands, and should protect the intellectual property and privacy of Tribal Nations.*

DOI Framing Question #2:

What performance measures would you like to see the Department track?

Proposed talking points:

- ❖ *The United States has assumed ongoing trust and treaty obligations to Tribal Nations and Tribal citizens and communities that are political in nature and for which we prepaid with our lands and resources. DOI is crucial in the fulfillment of those obligations. However, there is a severe lack of data on the United States’ delivery of its trust and treaty obligations and that must change. We encourage DOI to start tracking data useful for measuring its trust and treaty obligations and to engage in Tribal consultation with us to discuss this critically important issue further.*

DOI Framing Question #3:

Are there any questions you would like to see the Department pursue and learn about to become more efficient and effective?

Proposed talking points:

❖ *Indian Country and this Administration have many shared priorities and we encourage DOI to work with Tribal leaders to learn more about how to pursue these shared priorities together. Some examples of shared priorities include:*

- *Strengthening the government-to-government relationship so that Tribal Nations are partners in efficient and cost-effective decision-making.*
 - *This Administration values common-sense solutions and recognizes that local-level partners are best positioned to find them. As key local partners, the voices of sovereign Tribal governments must be central to all federal decisions that may impact Indian Country. An absence of meaningful Tribal consultation in making decisions that impact our lands, sacred places, public health, sovereignty, education, and other rights has often resulted in additional time and cost to the United States, Tribal Nations, and third parties. The Administration should lean on us as partners to increase efficiency and local control, as well as to deliver upon its legal obligations to consult with Tribal governments.*
- *Enhancing Tribal Nations' control over Tribal lands to develop robust economies.*
 - *In returning local control and reducing federal restrictions, the Trump Administration has an opportunity to jumpstart economic development in Indian Country. Tribal Nations, especially in remote areas, are often the largest providers of employment, healthcare, and other services. However, Tribal lands and economies are overregulated by the federal government to a degree not seen in any other sector. For example, burdensome regulations hinder the development of energy- and mineral-rich Tribal lands from which the United States could benefit and Tribal Nations could derive revenue. As this Administration removes burdensome limitations on economic development and implements its energy policies, special attention should be given to Tribal lands.*
- *Reducing burdens and use limitations on federal funding for Tribal Nations.*
 - *While expanding ISDEAA, the Administration can improve its implementation and further remove bureaucratic inefficiencies by streamlining the delivery and use of and reporting on federal funds. Many federal sources of Tribal funding contain unnecessary and inefficient limitations on their use and burdensome reporting requirements that take away from resources to provide direct services. A more efficient funding mechanism already exists for certain Tribal*

programs under Public Law 477, which reduces reporting requirements, allows for commingling and reallocation of funds across federal programs and agencies, and authorizes waiver of statutory and other requirements to optimize efficiency and responsiveness—all while funds continue to flow through underlying ISDEAA agreements. Reducing unnecessary reporting and use restrictions on Tribal Nations is a continuation of this Administration’s goal of spending federal funds efficiently and putting power in the hands of local governments.

➤ *Expanding opportunities for Tribal self-governance.*

- *This Administration appreciates that programs and services are most effective when implemented at the local level directly by and for the target communities. The Indian Self-Determination and Education Assistance Act (ISDEAA) has been an important tool that puts federal funding into Indian Country’s hands so that we may run federal programs more efficiently and effectively to serve our own communities. However, ISDEAA contracting and compacting is currently limited to certain federal agencies and programs. The Trump Administration during its first term successfully finalized a rule implementing the Tribal Transportation Self-Governance Program, which essentially expanded ISDEAA authority to the Department of Transportation. This Administration can build on its past successes while contributing to its ongoing government efficiency and local control efforts by extending ISDEAA to all federal agencies and programs that serve Tribal Nations, Tribal citizens, or Tribal communities.*

➤ *Helping Tribal Nations bring criminals to justice.*

- *President Trump has a history of pursuing criminals in Indian Country, including through his prior establishment of Operation Lady Justice and the Task Force on Missing and Murdered American Indians and Alaska Natives. The Administration can further help Tribal Nations get criminals off the streets by supporting more robust law enforcement. Federal judicial decisions and statutes limiting Tribal Nations’ exercise of criminal and other civil and regulatory jurisdiction within our territories paired with serious underfunding of federal and Tribal law enforcement measures on our lands has created a jurisdictional gap where criminals act with impunity. To stop these criminals, the Administration can work with Congress to remove impediments on our exercise of Tribal jurisdiction over all people and activities within our lands, and it can support sufficient funding for Tribal and federal law enforcement, detention, and courts. We also support a 477-like funding mechanism for public safety programs that would allow us to combine*

and receive all public safety funds through our ISDEAA agreements, ensuring these funds can be used as effectively as possible.

- *Protect religious resources, freedoms and expression.*
 - *The Trump Administration, past and present, has long championed religious freedom as a core value of the United States. All Americans have a recognized right to practice the religion of their choosing or heritage. For Tribal Nations, our religious practices often require access to and preservation of particular sacred sites and cultural heritage items—sometimes located on land we no longer hold. Approaching such matters from a place of mutual respect and shared ideals, the Administration can strengthen Tribal partnerships by protecting our right to practice our religions without disruption.*