

June 29, 2009

The Honorable Ken Salazar
Secretary of Interior
U.S. Department of Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Mr. Secretary:

We are writing to express our strong opposition to off-reservation gaming outside a Tribe's ancestral lands. We believe that numerous efforts currently underway by Tribes in several regions of the country undermine the Indian Gaming Regulatory Act (IGRA) and set a dangerous precedent for Indian gaming across the country.

In recent years, there has been an increase in the number of Tribes seeking off-reservation gaming under IGRA's Section 20 two-part determination and other statutory processes. Many of these applications are from Tribes who are seeking to establish casinos outside their ancestral lands and within the ancestral lands of another Tribe. In most cases, these Tribes have partnered with non-Indian developers to "reservation shop" for the best casino site, while cash strapped state and local governments eagerly encourage the process despite the harm to Indian gaming and Indian people.

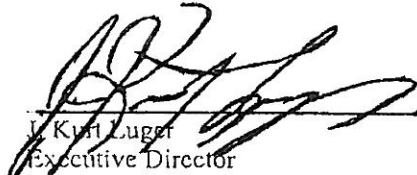
We firmly believe that Tribal gaming is government gaming. If the Department of the Interior were to allow the acquisition of lands for gaming outside of a Tribe's ancestral territories, it would undermine a basic premise of IGRA that gaming is intended to promote reservation economic development. This is what fundamentally separates Indian gaming from commercial gaming. Furthermore, the approval of any such projects would open the floodgates and would encourage Tribes to seek gaming facilities anywhere in any state where gaming is permissible regardless of whether it has historical or aboriginal connection to the lands. Without question, this would be a dangerous precedent that would undermine the success of IGRA.

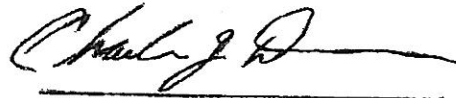
This is not only an issue that concerns Indian Country, but it was also the subject of extensive debate last year in the U.S. House of Representatives. On June 25, 2008, the U.S. House of Representatives considered legislation that would allow two Tribes in Michigan to take land into trust hundreds of miles from their reservations in order to settle a "proposed land claim." The debate over these bills essentially became a referendum on off-reservation gaming outside a Tribe's ancestral lands. These bills were opposed by over 70 Tribes across Indian Country, including some of the poorest Tribes in America. In the end, the legislation was soundly defeated by a bipartisan vote of 298-121. Since IGRA was passed in 1988, this has been the only vote in Congress on the issue of off-reservation gaming.

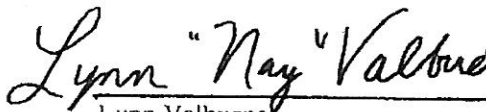
We believe it is critical that the Department of Interior reject all Section 20 applications, or applications based on other statutory processes, that are outside the ancestral lands of the Tribe seeking such approval. We would further request that the Department of Interior develop new regulations that would prohibit these egregious off-reservation gaming projects. Among other issues, these regulations must provide for comprehensive and meaningful consultations with Tribes who are affected by these off-reservation applications which the current regulations and the past practices of the Department do not protect. Finally, we would also request the opportunity to meet with you and your staff to discuss this issue in greater detail. We believe it is important that you hear directly from Indian Country on this important matter.

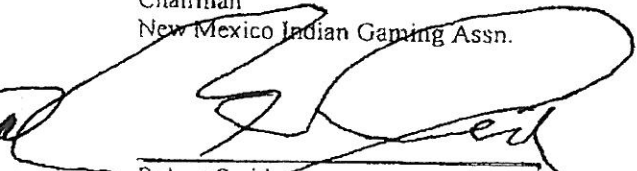
We want to thank you for your consideration of these requests and we look forward to working with you to improve the quality of life for Indian people.


Sincerely,



Kurt Luger
Executive Director
Great Plains Indian Gaming Assn.



Charlie Dorame
Chairman
New Mexico Indian Gaming Assn.


Lynn Valbuena
Chairwoman
Tribal Alliance of Sovereign Indian
Nations (TASIN)


Robert Smith
Chairman
California Tribal Business Alliance


John McCarthy
Executive Director
Minnesota Indian Gaming Assn.


Fred Cantu
Chief
Saginaw Chippewa Tribe of Michigan


William R. Rhodes
Governor
Gila River Indian Community