

date, the Secretary had “never approved an off-reservation land acquisition for gaming purposes” (emphasis in original).<sup>89</sup>

In March 1994, DOI responded to MIGA’s Jan. 10 letter to Secretary Babbitt. The letter, signed by Assistant Secretary Deer, explained that the Hudson application was under review by the MAO, which had initiated a consultation process as required by Section 20 of IGRA. The letter further explained: “Because this is the only opportunity for the tribes to express their views and objections to the proposed trust acquisition, it is important that the tribes respond to the Area Director’s consultation letter.” The letter continued: “Any and all factual information in support of [the tribes’] respective positions should be provided to the Area Director for consideration.”

### **3) MIGA and Its Members Contact the Minneapolis Area Office of BIA**

A few days after its January meeting with Manuel, the Mille Lacs Band sent a letter dated Jan. 15, 1994, to MAO Director Homer in response to her request for input, incorporating by reference the arguments made in MIGA’s Jan. 10 letter to Babbitt. The letter emphasized that IGRA “was designed to act as a reservation based economic tool” and was “never intended as a dog-track bail out tool.” The letter further argued, without providing any supporting data, that a casino in Hudson “would almost certainly, and perhaps dramatically, negatively affect business at our casino facilities, causing inevitable lay-offs.” A copy of the letter also was sent to Manuel.

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<sup>89</sup>In fact, by the time of the meeting, Secretary Babbitt had approved at least the Coshatta tribe’s application in Louisiana, although the Governor had vetoed it. Secretary Babbitt’s predecessor had also approved two applications under IGRA, the Forest County Potawatomi’s and the Siletz tribe’s applications. The Siletz application was later vetoed by the Governor, but the Forest County was approved by the Governor, resulting in the establishment of a casino in Milwaukee.