



# SALT RIVER

## PIMA-MARICOPA INDIAN COMMUNITY

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February 8, 2021

Elizabeth Appel  
Director  
Office of Regulatory Affairs & Collaborative Action ("RACA")  
United States Department of the Interior  
Mail Stop 4660  
1849 C Street NW  
Washington, DC 20240  
Email: [consultation@bia.gov](mailto:consultation@bia.gov)

Subject: RIN # 1076-AF56  
Proposed Rule to 25 CFR Part 150

Dear Director Appel:

On behalf of the Salt River Pima-Maricopa Indian Community ("SRPMIC" or "Community"), this letter provides comments on the proposed revisions to the Record of Title to Indian Land at 25 CFR Part 150. The Community generally supports the proposed rule but has some clarifications that we would like to bring to the attention of the Department of the Interior ("DOI"). By way of background, in 2018, the Community was able to incorporate the Land Title and Records Office ("LTRO") functions into its Self-Governance Compact and we now provide this service and function for all SRPMIC tribal and allotted lands. Therefore, the Community has firsthand experience in administering and carrying out LTRO responsibilities.

The Community's comments are below:

**25 CFR 150.301.** The Community would like to note that there is not an "official seal" that certifies a copy of a title document. The Community, as a self-governance tribe, has requested an "official seal" from our former LTRO liaisons. LTRO staff has notified SRPMIC that there is "no official seal". It is our understanding that other self-governance tribes report that they too have been told by LTRO that there is "no official seal".

**25 CFR 150.304.** In regard to Section 150.304, the Community requests that "title documents" be stricken from the test. We understand that other Agencies, Regions or LTROs should be able to print Title Status Reports ("TSRs"), however title documents should only be

accessed by the LTRO with jurisdiction over the specific lands. We are concerned that developers or title companies will “work around” the appropriate LTRO office, possibly obtaining outdated or inaccurate information. For example, if the Community is aware that there are probates pending a certain parcel of land, before issuing a title document, we would verify to see if any of the outstanding probates had been adjudicated and then update the records. Other LTRO or Agencies would not know about the pending probates and would issue a title document that was inaccurate. This will cause confusion for the Indian landowner, the developer and the title company with potential delays in lending or other actions.

**25 CFR 150.306.** The Community supports this provision as it only relates to “copies” of recorded title documents. If the Community, under its Self-Governance Compact, were to charge administrative fees, we should not be bound by Federal standards. These Federal standards are out of touch with “rush” orders, and other demands we face in providing excellent customer service.

Thank you in advance for your consideration of the Community’s comments. If you have any questions, please contact Theresa Rosier, Deputy General Counsel at [Theresa.Rosier@srpmic-nns.gov](mailto:Theresa.Rosier@srpmic-nns.gov) or (480) 362-7446.

Sincerely,



Martin Harvier,  
President