



Principal Deputy Director Margaret Everson  
US Fish & Wildlife Service  
1849 C Street NW  
Room 3331  
Washington, DC 20240-0001

July 23, 2019

Dear Director Everson,

As a sovereign nation, the Oneida Nation makes this submission on a government-to-government level with an agency of our fiduciary, not through a “public comment” web portal. The Oneida Nation, one of the Six Nations of the Haudenosaunee Confederacy, hereby provides notice that it opposes the US Fish and Wildlife Service (FWS)/Department of Interior (DOI) proposed rule to remove Endangered Species Act protections from the gray wolf.

The Oneida Nation is a member of the Great Lakes Inter-Tribal Council and stands in solidarity with other sovereign nations of that body which oppose gray wolf delisting. The United Tribes of Michigan passed a resolution opposing gray wolf delisting that accurately reflects the sentiments of many tribes in the Great Lakes region.

The gray wolf is sacred to the Oneida people, and has a prominent place in our cultural practices. Though this submission is not the appropriate forum to elaborate on our ceremonies or lifeways, the fact that one of our principal clans is the Wolf Clan indicates the significance of this sacred being. The Wolf Clan represents the path finders. Their responsibility is to guide the people to live their lives in the way the Creator intended. If the gray wolf is taken to the brink of extinction by removing federal protections, the impact this will have upon the Wolf Clan - and by extension our entire societal structure - will cause irreparable harm and infringe upon our ability to freely practice or religion.

The primary responsibility of the Faithkeepers is to ensure that our four sacred ceremonies are conducted and preserved. Our ceremonies follow the cycle of the seasons and are held within, and to foster, harmony and balance. In its lifeway, the gray wolf brings balance to the ecosystem. Wolves regulate the behavior of elk and deer populations, keeping herds from overgrazing. This allows trees to grow in greater abundance, grasses to grow taller, and other animals down the food chain to flourish, strengthening the resiliency of the entire ecosystem. What justification exists to upset this balance that is retained in so few places where the wolf presently exists? Are protections to be removed from wolves to satisfy trophy hunters and multinational energy corporations which covet the lands the wolf protects through its ESA status? Contrary to what “big game” trophy hunting organizations are professing, that “wolves are destroying hunting traditions,” wolves are preserving environmental balance. Our people are subsistence hunters; we

thrived in a symbiotic compact of reciprocity with all that sustained us. That is a hunting tradition, not a killing tradition.

As it did when attempting to delist the sacred grizzly bear from the ESA, the Trump Administration is contravening the federal-Indian trust responsibility by disregarding its obligation to initiate government-to-government consultation with impacted tribal nations over the delisting of the gray wolf. The Oneida Nation has not been consulted on the proposed gray wolf delisting. FWS and DOI must acknowledge that G2G consultation must not only be “thorough” and “meaningful” as mandated by EO 13175, but it must adhere to the standard of free, prior and informed consent. In 2010, the US endorsed the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) but has yet to honor that commitment. This proposed delisting of the gray wolf triggers Articles 25 and 26 of UNDRIP.

As was demonstrated throughout the Trump Administration’s attempt to delist the grizzly bear, the delisting of the gray wolf and the conduct of FWS and DOI in the process, threatens harm to tribal sovereignty, undermines treaty rights, and puts the American Indian Religious Freedom Act in jeopardy, leaving tribes’ religious and spiritual freedoms vulnerable. Respecting our rights and upholding its fiduciary obligation to the Oneida Nation and all tribal nations is not optional for this administration. Our treaties and the rights protected therein are enshrined in Article VI of the US Constitution.

FWS estimates that only 6,000 gray wolves still survive on a fraction of their historical range. In three out of the nine states where gray wolves exist (Wyoming, Montana and Idaho), at least 3,500 wolves have been killed by trophy hunters and trappers in under a decade. The gray wolf is functionally extinct in much of its pre-contact range. Extinction is a potential consequence of this delisting proposal. During the Obama Administration, FWS published documents exploring indigenous Traditional Ecological Knowledge (TEK), what it describes as “Native Science” gained “over hundreds or thousands of years through direct contact with the environment.” Indigenous TEK was used in the decision to list the polar bear under the in ESA, but since 2016 no effort has been made to seek and implement TEK in policies that relate to species of immense culturally significance to tribal nations. Our perspective on gray wolf delisting is supported by the five experts the FWS engaged to review its proposed gray wolf delisting rule. One of the biologists, Professor Daniel MacNulty of Utah State University, stated that the gray wolf delisting rule contained “demonstrable errors of fact, interpretation, and logic.”

In conclusion, FWS’s proposed rule to remove federal protections from the gray wolf is arbitrary and capricious.

Respectfully,



Tehassi Tasi Hill, Chairman  
Oneida Nation