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Public Comment: The US Fish and Wildlife Service (FWS) Proposed Rule: Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife.

To Whom It May Concern:

The Native Justice Coalition was formed in 2016 with the intent of being a platform for healing, social, and racial justice for all Native American people. We seek to provide a safe and nurturing platform for Native people based in an anti-oppression framework. Our goal is to bring resources, initiatives, and programming into our tribal communities that are creative, engaging, and transformative. We are based in Anishinaabe Aki and work in the 4 states and 2 provinces that occupy our homeland.

In 2015, the United Tribes of Michigan (UTM) passed Resolution # 036 2-11-2015 opposing the removal of federal protections from the gray wolf. The resolution recognized the cultural importance of the gray wolf to our people; not only those Native people in the Great Lakes and throughout the rest of our ancestral homeland, but also those tribal nations in territories marked by the Four Directions. Article IV of the resolution states: *Whereas, we recognize the wolf has a great significance to our community and has an important place in our culture. For time immemorial, the gray wolf has been held in reverence by Native people. In the realms of the physical and spiritual, the gray wolf has guided, taught, inspired and influenced. To remove Endangered Species Act (ESA) protections from the gray wolf and allow increased trophy killing and trapping, would cast the shadow of wolf extinction across our communities and impinge upon our ability to practice our ceremonial lifeway.*

The UTM resolution highlighted how the gray wolf was “hunted to the brink of extinction” which the removal of protections will potentially set in motion again. For evidence, one needs look no further than the US Fish and Wildlife Service’s (FWS) own data. The FWS estimates that today only 6,000 gray wolves survive in nine states. Whose voice was first heard upon this land? The wolf. And then ours, the First People. There were no “states” then. Native people and the wolf coexisted in a range so vast it is hard to fully comprehend today. In context, the land mass of nine states is a fragment. Since 2011, in the region of Montana, Idaho and Wyoming, trophy hunters and trappers have killed some 3,500 gray wolves –over half of the existing population in those nine states. These gray wolves were killed in such large numbers due to federal protections being lifted, and it was done so on the homelands of the Rocky Mountain Tribal Leaders Council tribes without consent. At that level of killing, how long would it be before the gray wolf was once more facing extinction?

There is no dispute that the gray wolf is functionally extinct in most of its historic range. The FWS's delisting proposal lacks scientific credibility, as the scientists engaged to review the delisting plan outlined in a 245-page report. "It looks like they (FWS) decided to delist and then they compiled all the evidence that they thought supported that decision. It simply doesn't support the decision," said Professor Adrian Treves of the University of Wisconsin. Some of his colleagues were not so generous in their denunciations. A gray wolf was recently sighted in northern Colorado. It has been identified as a collared wolf from a pack in Wyoming. This does not constitute wolf recovery in Colorado. The same has occurred in California and elsewhere. It signifies that the gray wolf may return to reoccupy these territories if given the chance – if federally protected. But even now, these pathfinder wolves are generally shot in short order. Breeding packs indicate a viable population, not the exploratory forays of a few lone wolves. The journeys of these lone wolves is further evidence that retaining ESA protections is absolutely vital for the continued survival and recovery of the gray wolf.

FWS is following the same pattern with the gray wolf as it did during its attempts to delist the sacred grizzly bear. The same issues that threatened Native people in the grizzly delisting struggle will resurface with gray wolf delisting: potential harm to tribal sovereignty, undermining treaty rights, and stripping religious and spiritual freedoms. Meaningful and thorough government-to-government consultation with tribes on any proposal to delist the gray wolf is the minimum standard the FWS and the Department of Interior must honor. As it stands, by pursuing its present course, the Trump Administration is again undermining the federal-Indian trust responsibility. A fiduciary obligation is not optional. In 2010, the United States endorsed the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) but has yet to honor that charter. This arbitrary and capricious action over the gray wolf is the latest violation of UNPRIP. These critical contraventions of laws, executive orders and international agreements must be addressed.

The Native Justice Coalition of Anishinaabe Aki stands in solidarity with the tribal nations and tribal bodies that oppose this proposal to delist the gray wolf; a First Peoples' alliance that now represents some 200 tribal nations.

Respectfully submitted,

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Enc. UTM Resolution # 036 2-11-2015