

# OUR LAND IS OUR FUTURE

UNION OF BRITISH COLUMBIA INDIAN CHIEFS

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September 28, 2021

Secretary Deb Haaland  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington DC 20240  
Via Email: [feedback@ios.doi.gov](mailto:feedback@ios.doi.gov)

## **Open Letter: Upholding the Historic Wolf Treaty and Vacating the Trump Rule to Delist the Gray Wolf (*Canis lupus*) from the U.S. Federal Endangered Species Act (ESA)**

It is a guiding principle of the Union of British Columbia Indian Chiefs (“UBCIC”) that our Aboriginal Title and Rights are inherent – a gift and responsibility given by the Creator to our Peoples, together with the laws to carry out these responsibilities. The UBCIC’s mandate is to work towards the implementation, exercise and recognition of our inherent Title, Rights and Treaty Rights and to protect of our Lands and Waters, through the exercise, and implementation of our own laws and jurisdiction.

An important component of this mandate involves the responsible, sustainable conservation and stewardship of wildlife, including protecting wildlife from any killing contests or unethical hunting practices that oppose Indigenous traditional values, ways of life, and fundamental rights. UBCIC previously passed Resolution 2015-11 and Resolution 2021-05 to strengthen this position and to articulate a renewed UBCIC mandate on hunting and wildlife management that is founded upon strong principles of conservation, stewardship, and accountability. Consequently, in upholding our mandate and position, UBCIC joined other Indigenous Nations in July 2019 to oppose the US Fish and Wildlife Service’s (FWS) proposal to delist the gray wolf from federal *Endangered Species Act* protections.

Joining hundreds of Tribal Nations in opposing the delisting of the wolf from the ESA, the UBCIC communicated our many concerns to the Trump Administration, including the need to recognize the sacredness and cultural significance the wolf holds for Tribal Nations. However, on January 4, 2021, without meaningful government-to-government tribal consultations, the Trump Administration enacted the Trump rule to delist the gray wolf from the ESA. Ultimately, the Trump Administration violated the law by not consulting with impacted Tribal Nations prior to its ruling; in a public meeting with

stakeholders in July 2021, Principal Deputy Director of the FWS, Martha Williams, confirmed and conceded that tribes had not been consulted in the delisting rule making process.

UBCIC now joins other Tribal Nations in calling upon the Secretary of the Interior Deb Haaland to restore ESA protections to the gray wolf and remind the Biden Administration that leaving the Trump wolf delisting rule in place contradicts President Biden's executive actions on both tribal consultation and climate change. Recent UN reports cited by President Biden stress the importance of including Tribal Ecological Knowledge (TEK) in climate change solutions. By ignoring tribes in the wolf delisting process, the Department of Interior and the U.S. Fish and Wildlife Service (FWS) also gave no consideration to TEK in Trump's wolf delisting rule.

As Secretary of Interior, Deb Haaland has the authority to vacate Trump's delisting rule, start the process over, and conduct it in accordance with the law, which means upholding the federal-Indian trust responsibility and conducting government-to-government tribal consultations. Secretary Haaland also has the authority to intervene in the Rocky Mountain region where state legislatures in Idaho and Montana have passed laws to cull wolf populations by 90% and 85% respectively, using inhumane, outlawed techniques. This has huge cross-border implications for First Nations that border these states. The recent announcement by the FWS that it is going to undertake a 12-month review of these impacts is totally inadequate as within 12 months it is quite clear that irreversible damage will be done. An emergency relisting of the wolf in the Rocky Mountains is the only responsible course of action.

The Trump delisting rule also has immense cross-border implications for First Nations with territories that border Washington State (including British Columbia), Minnesota, Wisconsin and Michigan, including First Nations north of the border who have treaty relationships with the US that pre-date establishment of the border. Many Nations, both south and north of the border, have called for the restoration of ESA protections to the gray wolf and have even made a [short film](#) appealing for Secretary Haaland to intervene. As the Global Indigenous Council is also leading a tribal delegation to meet with Secretary Haaland in the fall to present her with the historic [Wolf Treaty](#), signed and supported by over 100 tribes, including by the UBCIC leadership in 2019, the UBCIC supports the delegation's petition for Secretary Haaland to vacate Trump's delisting rule and return the wolf to ESA protections. As the Wolf Treaty has been described as the "blueprint for wolf management," we hope Secretary Haaland will honour and implement the immense wisdom contained in the treaty.

The Biden Administration must realize that what is at stake is the functional extinction of a sacred species that Indigenous people have coexisted with for millennia. Our traditional knowledge of the gray wolf and its habitat - our "science" - has endured for millenia, yet our input is still not sought on how best to recover this species and tend to the land it brings into ecological balance. The time is now for Secretary Haaland to rectify this and to stop not only the killing of the gray wolf, but the continued assault upon Indigenous cultures.

UBCIC reiterates our position that no scientific justification exists to delist the gray wolf – and no justification exists for the attack on Indigenous rights and cultures through the guise of the FWS "delisting" a sacred being.

**On behalf of the UNION OF BC INDIAN CHIEFS**



Grand Chief Stewart Phillip  
President



Chief Don Tom  
Vice-President



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Secretary-Treasurer

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