



September 28, 2021

Secretary Debra Haaland  
U.S. Secretary of the Interior  
Department of the Interior  
1849 C Street, N.W.  
Washington DC 20240

Dear Secretary Haaland:

First let me offer my congratulations on your herstoric appointment in March of this year. You are an inspiration to many Indigenous women across Turtle Island, including me.

I am writing to you on behalf of the Assembly of First Nations (AFN), the largest National Indigenous Organization in Canada, comprised of 634 Chiefs, representing all First Nations across the country. I want to express our support for those Tribes and First Nations who are calling for renewed federal protection of the gray wolf under the Endangered Species Act. The listing and delisting processes for endangered and/or threatened species must include “meaningful” and “robust” Nation-to-Nation consultation and collaboration, to fulfil commitments made under *Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments)* and *The Presidential Memorandum of January 26, 2021 (Tribal Consultation and Strengthening Nation-to-Nation Relationships)*. Further, these consultations must meet the standard of Free Prior and Informed Consent, as set out in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

The gray wolf is an extremely important species with tremendous cultural significance to many of our Nations with ties to Tribes across the Medicine Line (Canada-US border). It is the wolf who has brought us much of our knowledge and understanding of Mother Earth. As a symbol of survival and spiritual reciprocity, the wolf has influenced many of our Nations’ societal structures, imparted the communal responsibility to sustain life, and provided us with guidance for environmental stewardship— showing us the critical



importance of ensuring balance, health, and structure in ecosystems and the environment.

Over thousands of years, our Nations have cultivated traditional knowledge (TK) about the ecology and interrelationships between humans, animals, and their ecosystems. The United States Fish and Wildlife Service (FWS) must do more to appropriately recognize this body of knowledge and better reflect it in the in-depth status reviews and analyses that inform listing decisions and management practices.

In a public meeting with stakeholders in July 2021, Principal Deputy Director of the FWS Martha Williams conceded that Tribes had not been consulted by the Trump Administration in the delisting rule making process and, in effect, government had violated the law by not consulting with impacted Tribal Nations prior to delisting the gray wolf. By ignoring Tribes in the delisting process and failing to consider Tribes' traditional knowledge, the Department of Interior (DOI) and the FWS completely disregarded *Executive Order 13175*.

It is encouraging that President Biden has reaffirmed the federal government's commitment to Nation-to-Nation consultation and upholding the Federal-Indian Trust Responsibility. It is also a positive development to see that the FWS is moving forward in response to petitions to have the gray wolf re-listed. However, we are concerned with the pace of this progress as threats to the gray wolf have not been addressed since they were first listed. The gray wolf population will continue to decline over the twelve months it will take for the FWS to complete its review of these impacts, especially as states such as Idaho and Montana move forward with their planned culls.

Secretary Haaland, you have the authority to vacate the previous administration's delisting rule and start the process anew. I urge you to conduct the process in accordance with the law, upholding the Federal-Indian Trust Responsibility, and through Nation-to-Nation consultations with Tribes, to ensure that critical protections for the gray wolf are re-established before irreparable damage is caused to their populations. I further urge that you work closely with the Tribal Nations



signatory to *The Wolf: A Treaty of Cultural and Environmental Survival* more commonly referred to as “The Wolf Treaty” in resolving this issue.

Ninankamon!

Wishing you Peace beyond all understanding,

National Chief RoseAnne Archibald

c.c.: President Joe Biden  
Prime Minister Justin Trudeau  
President, Fawn R. Sharp, National Congress of American Indians  
First Vice President Aaron Payment, National Congress of American Indians  
Regional Chief Kluane Adamek, AFN Yukon Region  
Grand Chief Stewart Phillip, Union of British Columbia Indian Chiefs