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January 25, 2022

Rep. Gary Howell, Chair  
Natural Resources and Outdoor Recreation Committee  
Room 307, House Office Building  
Lansing, MI

**RE: PRIMARY RECOMMENDATIONS FOR WOLF MANAGEMENT PLANS**

Dear Mr. Howell,

On behalf of Gnoozhekaaning, "Place of the Pike," or Bay Mills Indian Community I am pleased to offer these comments to the House Natural Resources and Outdoor Recreation Committee concerning the Senate Concurrent Resolution No. 7 (SCR 7) to authorize the Department of Natural Resources to organize wolf hunting and trapping as part of the State's Wolf Management efforts beginning in 2021. Bay Mills Indian Community is a sovereign Tribal Nation, located in the Upper Peninsula of Michigan, and signatory to the Treaty of March 28, 1836 (7 Stat. 491) by which the right to hunt, fish and gather in the ceded lands and waters of Michigan was expressly reserved for all time.

At the outset, throughout these comments the word "wolf" shall be replaced with its traditional Ojibwe word ma'iingan, as wolves are sacred beings to Bay Mills Indian Community as well as other Anishinaabeg people and should be treated as such. According to our historical and traditional teachings from the Creation Story it is clear that ma'iingan is a brother, with whom the fate of the people is intertwined. As such, the Tribal Nations' goal for the ma'iingan population is to be healthy and in balance with the other more-than-human beings in the world. The Tribal Nations will respect the responsibility they accepted in their treaty with ma'iingan, consider and act upon their best interests, and be appreciative and humble in accepting the gifts ma'iinganag provide.

We offer these comments to uplift the best interests of ma'iingan, and ask the Michigan Department of Natural Resources to take them into serious consideration:

**Population Goal**

*Ecological role of ma'iinganag:* Ma'iingan hold an irreplaceable role and function in the ceded territory. They are critical to maintaining the long-term health of the deer and elk herds by removing sick, injured and weak individuals. Their impacts on the distribution and behavior of deer and elk also help protect important medicinal plants from over browsing. They may play an important role in reducing the level of many density-dependent diseases, including tick borne diseases and Chronic Wasting Disease (CWD). These and other values, including ones which humans have yet to learn, reinforces the need to have ma'iingan on the landscape in all areas of suitable habitat.

The Anishinaabeg cultural values of ma'iingan also supports the idea that ma'iingan have intrinsic values, and a right to occupy their traditional lands.

The combined ecological and cultural teachings indicate that ma'iinganag should be allowed to determine their own natural level of abundance on the landscape, and to decide their general distribution or range. This goal respects ma'iinganag and allows them to fulfill their treaty with the Anishinaabeg. Only when the ma'iingan population is at its full, natural level, is it able to provide all of the benefits (often called ecological services in western language) upon which the Tribal Nations depend.

The goal of 200 animals initially set by the Michigan Department of Natural Resources was set based on a "social carrying capacity" last investigated in 2007 that fails to consider Traditional Ecological Knowledge and Indigenous views of ma'iinganag (Peyton et al. 2007). It also fails to consider the carrying capacity of the landscape itself.

## **Education**

Falsehoods and misunderstandings continue to cloud ma'iingan stewardship, and often result in unfounded actions in state management plans. While ma'iingan plans uniformly recognize the great need for education not only of the public but of political leaders, implementation of education efforts often falls short of recognized needs. Sound educational outreach efforts should be a priority in ma'iingan plans, should be adequately funded, and should include tribal perspectives.

## **Conflict Management**

Resolution SCR 7 states that "the commission should, to the greatest extent practicable, utilize principles of sound scientific management in making decisions regarding the taking of game". Yet, according to many scientific studies, predator control programs have weak scientific basis and can instead exacerbate issues by disrupting pack structure, natural reproduction, and ecological communities.

While conflict management is often over-emphasized in ma'iingan plans, some ma'iinganag do cause problems for some people, and it is important to address these issues in timely, sound and appropriate ways.

*Livestock depredations:* General hunting seasons provide little or no relief to people suffering livestock depredations, as these seasons are not timely, and are not focused on the areas where depredations occur. Effective resolution of livestock depredations can often be achieved through the use of animal damage control specialists. To be effective, several components are involved, including verifying that ma'iinganag caused the losses, addressing animal husbandry practices which may contribute to the losses, and determining the optimal response. Tribal Nations within the Chippewa Ottawa Resource Authority and the Great Lakes Indian Fish and Wildlife Commission prioritize the use of non-lethal approaches to losses; lethal control should only be used as a last resort, after non-lethal methods have proved ineffective. In addition, efforts to prevent livestock losses from occurring in the first place should be pursued wherever practicable.

Tribal Nations should be given the opportunity to co-investigate reported livestock depredations attributed to ma'iingan packs that spend time on tribal lands. An agreed upon buffer area should be determined for each reservation via government-to-government consultation. An effort to reach consensus should be made on the appropriate response to the situation.

*Pet depredations:* Pets that are depredated on private property, under the owner's control, may be responded to in a similar manner as livestock. However, dogs which are depredated in the act of hunting or training must be considered differently. There is an inherent risk assumed by people that allow dogs to roam unleashed in ma'iingan range, and ma'iinganag should never be killed in response to dog depredations under these conditions, especially on public lands.

Similarly, ma'iingan depredations on game farms should not result in lethal control of ma'iinganag. Game farms should be required to use and maintain predator-proof fencing, both to protect their animals and to prevent the escape of game farm animals into the wild.

*Human health and safety concerns:* Although very rare, individual ma'iinganag may occasionally present legitimate human health and safety concerns. While the risk ma'iinganag presents to the public is far less than that presented by bees, lightning or dogs, it is again important to respond in a timely and targeted manner when they do occur, and appropriate responses may include lethal control of individual ma'iinganag.

However, it is important to recognize that many people have been raised to fear ma'iinganag, and as a result they may perceive or believe that threats exist when they do not. The mere presence of ma'iinganag in an area used by humans does not constitute a threat and should not result in the killing of ma'iinganag. Unreasonable fears should be addressed through educational efforts.

*Penalties and restitution:* Penalties and restitution for illegal killing of ma'iinganag should be adequate to discourage this activity and commensurate with other wildlife species.

## **Research and Monitoring**

We have much yet to learn (or relearn) about ma'iinganag, and ma'iingan plans commonly include extensive sections identifying research and monitoring needs. Some primary needs include: disease monitoring; population monitoring; better determination of non-lethal methods to prevent or reduce livestock conflicts; research on the impact of human take on ma'iingan survival and pack cohesiveness; research on the ecological benefits of ma'iinganag in forest health and deer health, including impacts on CWD; research on the potential reduction of tick-borne disease prevalence as a result of impacts on trophic levels; additional documentation of the reduction in car/wildlife accidents in ma'iinganag range; and human dimensions research on ma'iinganag attitudes among social groups (including ethnic groups).

## **Recreational Harvest**

Justification for a primarily harvest-based model of wildlife management is rooted in the flawed North American Model of Wildlife Management, which fails to consider any Traditional Ecological Knowledge or Indigenous views. The recreational harvest of brother ma'iingan is inconsistent with Anishinaabeg cultural values and ecological needs. Should the state proceed with

recreational harvest against the tribes' wishes, there are several steps the state must take regarding the quota setting process. As exemplified by requirements in the *LCO v. Wisconsin* case, any quota must be developed in full consultation with the affected tribes; every reasonable effort shall be made to reach consensus on the quota. Any quota to be established must take into account known and estimated human-induced mortality, and the established quota must include all taking regulated by state or tribal governments, including the lethal taking of ma'iinganag as part of livestock protection efforts.

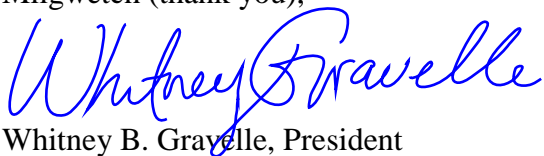
Any killing which does occur must not reduce the population below full occupancy, or tribal ecological interests will be harmed. Recreational killing must not disproportionately occur on the public lands upon which the tribes depend for their treaty-reserved harvests, and the ecological services provided by ma'iinganag. The majority of conflicts with ma'iinganag on public lands results from letting dogs roam unleashed. This is a risk assumed by the dog's owner, and not a valid justification to harvest ma'iinganag from public lands. Public lands should have a zero quota. In addition to these quota concerns, when any recreational harvest occurs, closed areas should be established to enhance ma'iingan stewardship. Closed areas should include buffer zones around tribal reservations to allow the tribes to protect ma'iinganag on tribal lands; these zones should be established through consultation with individual tribes.

At least one research closed area should be established to allow the study of unharvested ma'iingan populations. This area could include one or more tribal reservations, but needs to be large enough to allow meaningful research.

Areas where CWD is endemic should be closed to ma'iingan harvest to allow for research to determine if ma'iingan can reduce the prevalence of CWD via selective predation.

Although our ancestors were willing to provide land to the United States, they carefully protected our traditional lifeways and its reliance on the environment's natural resources and ecosystems for survival, something that is supported by ma'iinganag's continued existence within the natural landscape. We ask the Natural Resources and Outdoor Recreation Committee to not pass SCR 7, and instead help us honor our ma'iingan ancestors in the State of Michigan.

Miigwetch (thank you),



Whitney B. Gravelle, President  
Bay Mills Indian Community