

GREAT LAKES INDIAN FISH & WILDLIFE COMMISSION

P. O. Box 9 • Odanah, WI 54861 • 715/682-6619 • FAX 715/682-9294



• MEMBER TRIBES •

MICHIGAN

Bay Mills Community
Keweenaw Bay Community
Lac Vieux Desert Band

WISCONSIN

Bad River Band
Lac Courte Oreilles Band
Lac du Flambeau Band

MINNESOTA

Fond du Lac Band
Mille Lacs Band

July 10, 2019

Public Comments Processing

Attn: Docket No. FWS-HQ-ES-2018-0097

U.S. Fish & Wildlife Service Headquarters

MS: BPHC

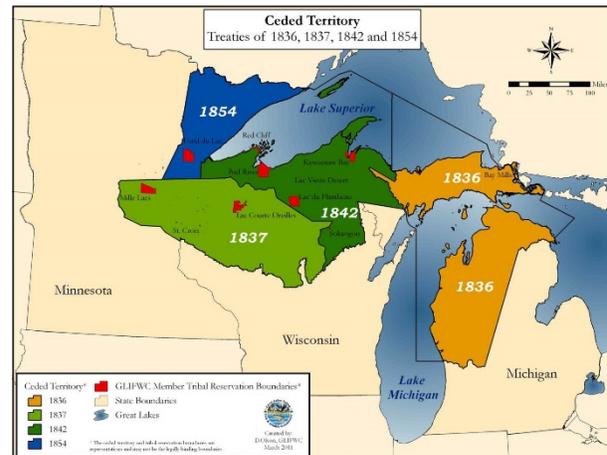
5275 Leesburg Pike

Falls Church, VA 22041-3803

ELECTRONICALLY SUBMITTED

Dear Sir or Madam:

These comments on the Proposed Rule to Remove Ma'iingan (Grey Wolf/*Canis lupus*) from the List of Endangered and Threatened Wildlife, Docket No. FWS-HQ-ES-2018-0097 (Proposed Rule), have been authorized by the Board of Commissioners (Board) and the Voigt Intertribal Task Force (Task Force) of the Great Lakes Indian Fish and Wildlife Commission (GLIFWC or Commission) from the perspective of their off-reservation treaty rights. GLIFWC is a natural resource agency exercising delegated authority from 11 federally recognized Indian tribes in Michigan, Minnesota, and Wisconsin.¹ These tribes retain reserved hunting, fishing, and gathering rights in territories ceded to the United States in various treaties, rights that have been reaffirmed by federal courts, including the US Supreme Court. The ceded territories extend over portions of Minnesota, Wisconsin, and



¹ GLIFWC member tribes are: in Wisconsin – the Bad River Band of the Lake Superior Tribe of Chippewa Indians, Lac du Flambeau Band of Lake Superior Chippewa Indians, Lac Courte Oreilles Band of Lake Superior Chippewa Indians, St. Croix Chippewa Indians of Wisconsin, Sokaogon Chippewa Community of the Mole Lake Band, and Red Cliff Band of Lake Superior Chippewa Indians; in Minnesota – Fond du Lac Chippewa Tribe, and Mille Lacs Band of Chippewa Indians; and in Michigan – Bay Mills Indian Community, Keweenaw Bay Indian Community, and Lac Vieux Desert Band of Lake Superior Chippewa Indians.

Michigan (see map at right). In addition to these comments, the Board and the Task Force have adopted resolutions opposing the proposed action.

Comments by GLIFWC do not preclude member Tribes' comments on the proposed rule in their own sovereign capacities, especially regarding the rule's application to on-reservation interests.

These comments address a variety of concerns that GLIFWC member Tribes have articulated regarding the desire of the Service to terminate its management authority and federal protection for Ma'iingan. The Board and the Task Force oppose delisting Ma'iingan because in part of the inaccurate assumptions and data gaps contained within the justification for the proposed rule, explained further below. The Board and the Task Force also object to the Service's intent to abandon all management authority over Ma'iingan despite the continuing obligations of the federal government to protect GLIFWC member Tribes' treaty-reserved interests.

Ma'iingan continues to be a highly-regarded species by the Ojibwe. The Ojibwe consider Ma'iingan to possess equal, or superior, capacity to human beings with respect to intelligence and agility, but also in terms of Ma'iingan's parenting skills and ability to coordinate and communicate collective action. Ma'iingan is also a resource manager. As an apex hunter, Ma'iingan can detect the presence of disease and physical defects in prey species, hunting weaker animals to keep the herds strong and living in balance with plant communities. Within the Ojibwe creation story, Ma'iingan walked with Wenaboozhoo, or Original Man, after they received instructions to travel throughout the earth, naming all aspects of creation. At the end of that journey, Wenaboozhoo and Ma'iingan parted ways. However, before parting, the Creator explained that the Ojibwe and Ma'iingan would always be related as brothers, whatever befalls one would befall the other, and that they would both be forever feared and misunderstood. For the Ojibwe, Ma'iingan is not a "resource" to be managed, but is considered a brother. Thus, the Board and Task Force strongly object to any action taken by the United States, and the separate states that fails to incorporate the sacred obligation we have as human beings to protect Ma'iingan, promote understanding of its critical role in natural systems and ensure the long-term health of Ma'iingan populations, at their natural carrying capacity and within historic ranges.

The Board, Task Force and GLIFWC's Biological Services and Policy staff have carefully reviewed the justification set forth to support the Service's Proposed Rule. GLIFWC staff has been providing technical assistance to the Tribes on issues pertaining to off-reservation wildlife management for more than 30 years, including periods of time when delisting had been contemplated and delisting occurred, with states and tribes resuming management authority. The comments set forth herein, addressing the proposed rule, are informed by this practical experience and expertise.

Inconsistent Application of Range Definition and Inadequate Consideration of Range: The Service's conclusion that the word range, as used in the term "significant portion of

its range,”² applies only to the range in which the species currently exists is inconsistent with past Service actions and creates logical inconsistencies that run counter to the intent of the Endangered Species Act. Had this interpretation been applied when the Endangered Species Act was first passed, it is likely that Ma’iingan would never have been listed at all. As the delisting proposal itself points out, at the time of the 1978 listing, the Ma’iingan population in Minnesota numbered over 1,200 animals, was growing, and had not showed an appreciable decline in three quarters of a century.

In addition, this definition creates an illogical situation where, if small numbers of a given species remained scattered in areas where they previously existed in abundance – and were likely to be lost from those areas - they would merit protection under the Endangered Species Act. However, once the species is fully eliminated from any portion of its range, that area no longer merits any consideration under the Endangered Species Act. This definition creates a perverse incentive for those opposed to establishing Endangered Species Act protections to completely eradicate animals from areas, in direct opposition to the intent of the Endangered Species Act.

Similarly, while this interpretation might provide protection for the *last* few individuals of a species in an area where the population is declining, it removes protections from the *first* few individuals of a species attempting to reoccupy historic range (such as Ma’iingan populations in central Oregon and Washington discussed in the Proposed Rule). These “front-edge” individuals are, in fact, critical to fulfilling the Act’s intent of having species exist within significant portions of their range. The Proposed Rule notes that the 1978 endangered listing “*appropriately* protected dispersing wolves throughout the historical range of *C. lupus*” (emphasis added). That protection remains appropriate today, where significant areas of suitable Ma’iingan range remain unoccupied.

Separate and apart from the validity of the Service’s interpretation of range contained within the Final Policy on Interpretation of the Phrase “Significant Portion of Its Range” in the Endangered Species Act’s Definition of “Endangered Species” and “Threatened Species,”³ the delisting of Ma’iingan and resumption of state and tribal management authority poses a significant threat to the existence of Ma’iingan populations living within its current range. Ma’iingan populations living on the “front-edge” within western states and in the Great Lakes region would be vulnerable to eradication from human-caused mortality. As discussed further below, the implementation of Wisconsin’s current management plan (stated goal of 350 individuals),⁴ which will be achieved through the state’s wolf hunting and trapping season required by statute⁵ and Department of Natural Resources (DNR) regulation⁶ constitutes a threat,

² Proposed Rule, 9682.

³ 79 Fed. Reg. 37,578 (July 1, 2014).

⁴ Wisconsin Wolf Management Plan, Wisconsin Department of Natural Resources, October 27, 1999, available at <https://dnr.wi.gov/files/PDF/pubs/ER/ER0099.pdf>.

⁵ Wis. Stat. § 29.185 (Wolf Harvesting Licenses).

⁶ Wis. Admin. Rule NR 10.20.

within the foreseeable future, to the ability of Ma'iingan populations to survive and thrive throughout a significant portion of its current range.

The Service should re-evaluate the delisting proposal under an interpretation of range consistent with the original intent of the Endangered Species Act, and should analyze the effect that delisting will have on the ability of Ma'iingan populations to continue to occupy their current range.

Inadequate Consideration of Post-Delisting Management by the States, Particularly Wisconsin: The proposal frequently uses outdated information in evaluating the conditions Ma'iingan will face post delisting. For example, it states “recently the Wisconsin DNR began work on updating the State’s wolf-management plan, which may include increasing the State management goal (Wydeven and Wiedenhoef 2009, p. 3).”⁷ A decade ago is not recent, and in fact, this effort was dropped 4 ½ years ago.

Similarly, the Proposed Rule also assumes that every protective activity listed in state management plans are actually being carried out. Management plans are generally written from a “best case scenario” perspective, and include many suggested actions that often go unimplemented in the face of limited staff and competing budget priorities. In reviewing the adequacy of state management plans, the Service has an obligation to determine how management by the states is actually occurring – not simply by reiterating what is stated in existing plans.

Of particular note, the one management plan goal that the Service assumed Wisconsin would *not* follow is its population goal. The Service conjectures that the three Midwestern states (Minnesota, Michigan and Wisconsin) will “maintain populations at sustainable levels well above management objectives” without providing any supporting evidence.⁸ Wisconsin has had ample opportunity to alter its population goal and has intentionally not done so. The Service *must* conduct an analysis of the likely impacts of Wisconsin implementing its stated population objective and state law provisions. With a 2018 Ma'iingan population within Wisconsin of approximately 900 individuals,⁹ it is entirely possible that this population would be reduced by 60%. Reducing its current population by over 60% to meet its stated population goal could foreseeably result in the Ma'iingan population being eliminated or severely reduced in a significant portion of its current range.

Finally, the proposal largely praises Wisconsin’s “management” efforts, which it says are designed to put higher harvest rates in non-core habitats. However, in 2014, during the harvest season in which hunting of Ma'iingan under state law was last allowed, Wisconsin established a quota of 15 individuals in zone 2 (an area with good wolf habitat and minimal depredation

⁷ Proposed Rule, 9670.

⁸ Proposed Rule, 9681.

⁹ Wisconsin Department of Natural Resources, Wisconsin Grey Wolf Monitoring Report 15 April 2017 Through 14 April 2018, 3, available at <https://dnr.wi.gov/topic/Wildlifehabitat/wolf/documents/wolfreport2018.pdf>.

events), but harvested 29. To date, the state has not developed a methodology to prevent a similar zone over-harvest from occurring, nor has the state developed a method to adequately adjust its quotas to account for illegal poaching, which is significant.¹⁰

Overstated Ability of Tribes to Protect Wolves: Part of the rationale for this decision hinges upon the conditions wolves would face post-delisting, and part of the analysis in the Proposed Rule relies on the premise that Ma'iingan populations will be protected in part by tribes, who generally place a high cultural and ecological value on wolves. This analysis is flawed, markedly overstating the ability of the tribes to protect and steward Ma'iingan populations, and to work cooperatively with the states in wildlife stewardship, at least in the Midwest.

The proposal is correct in noting that many Midwestern tribes and their inter-tribal natural resource management agencies (including GLIFWC) maintain a “predominant sentiment” of strong support for the continued protection of Ma'iingan populations at a level that ensures that viable populations remain on reservations and throughout the treaty-ceded lands.¹¹ However, sentiment alone is insufficient to protect Ma'iingan. Most tribal reservations in the Midwest are too small to include all of a pack's territory. Thus, even if a tribe provides complete protection to wolves within the reservation, and the respective state does not allow hunting on non-tribal lands within reservation boundaries (which itself is not assured), these individuals can be, and are, killed when they leave the reservation. For example, in 2013, when GLIFWC member Tribes attempted to protect Ma'iingan populations by issuing a declaration of 100% of the Ma'iingan available within the Wisconsin Ceded Territory and not harvesting them, Wisconsin independently established a harvest quota and harvested individuals GLIFWC member Tribes intended to protect.

In short, while the tribes may have an *intent* to work closely with the states, that intent fails to protect Ma'iingan populations if the respective states do not exhibit a similar intent to work with the tribes. To date, the states in the Midwest have not shown that intent.

Overstated Ability of Wolves' Capacity to Recover: The delisting proposal greatly over-simplifies the ability of Ma'iingan populations to recover. The ecological review in the document frequently implies recovery is simple and rapid. For example, the proposal states that “wolf populations can rapidly overcome severe disruptions, such as pervasive human-caused mortality or disease,”¹² that a “wolf population can increase rapidly after severe declines if the source of mortality is reduced”¹³ and that dispersal capabilities allow a wolf population to quickly expand and colonize nearby areas, “even areas separated by broad expanses of unsuitable

¹⁰ Treves, A, et al., *Grey wolf mortality patterns in Wisconsin from 1979 to 2012*, 98 JOURNAL OF MAMMOLOGY 17-32 (2017), available at <https://academic.oup.com/jmammal/article/98/1/17/2977342>.

¹¹ Proposed Rule 9678.

¹² Proposed Rule, 9682.

¹³ Proposed Rule, 9654.

habitat.”¹⁴ While these statements may be true within limited contexts, if they were generally true, Ma’iingan populations would not have been lost from vast portions of their range, and would have recovered much more rapidly under Endangered Species Act protections than they have. For example, it took 25 years for the Ma’iingan population in Wisconsin to recover to just 200 animals after wolves had re-entered the state. The Service needs to accurately depict the ability of Ma’iingan populations to recover on the contemporary landscape.

The United States’ Trust Obligation to Uphold Treaty Reserved Rights and Protect Ma’iingan. GLIFWC member Tribes continue to depend on wild animals and plants found within their Ceded Territories. The presence of Ma’iingan within the Ceded Territories safeguards treaty interests, including the traditional food and healthcare system of the Tribes. In fulfilling its biological role, Ma’iingan serves as a meat inspector, removing sick and injured deer from animal stocks harvested by the Ojibwe. Ma’iingan is also a forest manager, protecting wild plant species harvested by the Ojibwe for food and medicine, from overgrazing. The importance of Ma’iingan within the Ceded Territories, in terms of its capacity to bring wellbeing and balance to natural environments, and to support human communities, continues to grow with the presence of threats in the form of climate change, invasive species and contagious animal diseases, such as chronic wasting disease.

Similar to Ma’iingan, Migizi (bald eagle/*Haliaeetus leucocephalus*) is not hunted by the Ojibwe, but rather revered as a species of significant cultural importance. Both these animals serve critical functions, and are key indicators to the overall health of the ecosystems within the Great Lakes region. The Service, in its fulfillment of obligations to carry out the Bald and Golden Eagle Protection Act, has acknowledged the cultural importance of Migizi to Indian tribes, and continues to creatively address the legal challenges posed by the Act to Indian tribes seeking to carry out cultural traditions.¹⁵ The Task Force applauds the leadership that the Service has taken to uphold the treaty reserved rights and cultural rights of Indian tribes to take, possess and exchange feathers and other parts from Migizi and encourages the Service to take a similar approach in furtherance of the Tribes’ reserved right to protect Ma’iingan and the natural systems that Ma’iingan safeguards.

The United States enjoys the benefits of a treaty relationship with GLIFWC member Tribes. In the Treaties of 1836, 1837, 1842 and 1854, the United States negotiated for millions of acres of land controlled by the Ojibwe for settlement and economic development. In exchange, the United States offered recognition of the various Ojibwe bands as Indian tribes of the United States, but importantly, also took on the obligation to honor the agreements made within the treaties and protect the self-government rights of the Ojibwe. Among the agreements made in treaties, the Ojibwe specifically reserved rights to hunt, fish and gather within the territories ceded.¹⁶ These explicit reservations were made to sustain present and future generations. Ojibwe

¹⁴ Proposed Rule, 9654.

¹⁵ See 50 C.F.R. § 22.22.

¹⁶ Treaty of 1836, 7 Stat. 491; Treaty of 1837, 7 Stat. 536; Treaty of 1842, 7 Stat. 591; and see *Minnesota v. Mille Lacs Band of Chippewa*, 119 S.Ct. 1187, 1206 (1999).

treaties remain valid and continue to govern the exercise of tribal hunting, fishing, gathering, and other activities within the Ceded Territories. Likewise, the states have been required to refrain from enforcing their fish and game laws on tribal harvesting activities and limit the full take of non-Indians in order to accommodate the reserved rights of the Tribes.¹⁷

The reserved rights of the Ojibwe are not simply limited to those items taken by tribal members from the landscape for immediate personal consumption, but rather incorporate the continuance of a lifeway that encompasses a broad range of activities and rights. These include the exercise of cultural rights,¹⁸ protection for important habitat,¹⁹ commercial harvest,²⁰ and the use of public lands under permits issued by the Tribes.²¹ It is the position of the Task Force that the federal government and agencies such as the Service have an affirmative duty, originating from the treaty relationship, to ensure that Ma'iingan populations are protected in furtherance of the Tribes' reserved rights. The recent decision in *United States v. Washington* supports the Tribes' position that the treaties require affirmative action to protect functioning of the ecosystems that provide opportunity for the exercise of the reserved rights.²²

The treaty and trust obligations of the United States and its agencies to safeguard tribal rights is reflected in the treaties themselves, but has also been expressed in decisions by the federal courts,²³ in the fact that the Department of Justice has served as a plaintiff in many lawsuits seeking recognition of tribal treaty rights,²⁴ and within Executive Orders²⁵ and policy statements

¹⁷ See e.g. *Lac Courte Oreilles Band of Lake Superior Chippewa Indians v. Wisconsin*, 668 F.Supp. 1233, 1241 (W.D. Wisc. 1987).

¹⁸ Off Reservation Conservation Code, Section 1.09, available at <http://www.glifwc.org/Regulations/VoigtModelCode.2018.internal.links.pdf>

¹⁹ *Stipulation and Consent Decree in regard to the Tribal Harvest of Wild Rice* (Docket 1222), incorporated into the Final Judgment: *Lac Courte Oreilles Band of Lake Superior Chippewa Indians v. Wisconsin*, 775 F.Supp. 321, 324 (W.D. Wisc. 1991).

²⁰ *Lac Courte Oreilles Band of Lake Superior Chippewa Indians v. Wisconsin*, 653 F.Supp. 1420, 1430 (W.D. Wisc. 1987).

²¹ Memorandum of Understanding Regarding Tribal-USDA Forest Service Relations on National Forest Lands within the Territories Ceded in the Treaties of 1836, 1837 and 1842, National Forest Campground and Length of Stay Restriction Exemption Agreement (Version 1.0), available at https://data.glifwc.org/camping/documents/Campground_Agreement.pdf.

²² *853 F.3d 946 (9th Cir. 2017)*, *aff'd Washington v. United States*, 138 S.Ct. 1832 (2018); and see *Northwest Sea Farms v. Army Corps of Engineers*, 931 F.Supp. 1515, 1520 (W.D. Wash. 1996).

²³ See, e.g., *U.S. v. Mitchell*, 463 U.S. 206, 224 (1983) (the Federal Government has “full responsibility to manage Indian resources and land for the benefit of Indians”); *Tulee v. Washington*, 315 U.S. 681, 684 (1942) (“It is our responsibility to see that the terms of the treaty are carried out. . . in accordance with the meaning they were understood to have by the [tribes]. . . and in a spirit which generously recognizes the full obligation of this nation to protect the interests of a dependent people”).

²⁴ See, e.g., *U.S. v. Washington*, 384 F. Supp. 312 (W.D. Wash. 1974); *U.S. v. Michigan*, 471 F. Supp. 192 (W.D. Mich. 1979).

²⁵ See, e.g., *Consultation and Coordination With Indian Tribal Governments*, 65 FR 67249 (2000) (“The Federal Government has enacted numerous statutes and promulgated numerous regulations that establish and define a trust relationship with Indian tribes.”); *Establishing the White House Council on Native American Affairs*, 78 FR 39539 (2013) (“This order establishes a national policy to ensure the Federal Government engages in a true. . . relationship with federally recognized tribes. . . by better carrying out its trust responsibilities”).

of the Department of the Interior.²⁶ In recognition of the importance of Ma'iingan as an iconic animal of North America, and an animal which suffers from human misconceptions about its dangerousness to human interests, GLIFWC and its member tribes seek partnership with the Service to consider management frameworks outside the parameters of the Endangered Species Act, including the Tribes' reserved rights. Ideally, we would work together to change public perceptions about Ma'iingan and cooperate to ensure its ability to persist and thrive within the Great Lakes region, and other suitable areas within the United States, at the natural carrying capacity of these places.

Representatives of the Service met with the Voigt Intertribal Task Force at its May regular meeting to talk through concerns and questions. Tribal representatives requested more detailed information on the Service's analysis of its treaty and trust responsibilities to the Tribes with respect to Ma'iingan management post-delisting, and Service representatives agreed to arrange a meeting among staff of the Service, the Commission and tribal representatives. These comments may be supplemented after the promised communication occurs.

Sincerely,



Michael J. Isham, Jr.
Executive Administrator

Attachments: Resolution of the Board of Commissioners, "Supporting Protection for Ma'iingan," Resolution No. BOC-05-28-2019-02, dated May 28, 2019.

²⁶ See, e.g., *Principles for the Discharge of the Secretary's Trust Responsibility*, Order No. 3215 (2000) (providing guidance to employees "who are responsible for carrying out the Secretary's trust responsibility as it pertains to Indian trust assets"); *American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the Endangered Species Act*, Secretarial Order 3206 (1997) ("The unique and distinctive political relationship between the United States and Indian tribes. . . has given rise to a special federal trust responsibility, involving. . . the application of fiduciary standards. . . with respect to Indian lands, tribal trust resources, and the exercise of tribal rights"); see also *Department of the Interior Policy on Consultation with Indian Tribes*, Order No. 3317 (2011).

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Resolution No. BOC-05-28-2019-02

Supporting Protection for Ma'iingan

- WHEREAS, the Great Lakes Indian Fish and Wildlife Commission (Commission) is an intertribal agency exercising delegated sovereign authority from 11 federally recognized Anishinaabe Tribes in Michigan, Wisconsin and Minnesota, which have retained hunting, fishing and gathering rights in territories ceded to the United States in the Treaties of 1836, 1837, 1842 and 1854; and
- WHEREAS, the Commission's mission includes a duty to assist member Tribes in the conservation and stewardship of plant and animal communities throughout the Treaty Territories, thereby ensuring opportunities to practice the traditional Anishinaabe lifeway; and
- WHEREAS, the Anishinaabe lifeway, as recognized and protected by the federal courts, depends on the maintenance of natural balance among plant and animal beings sharing the land, air and waters within the Treaty Territories; and
- WHEREAS Ma'iingan, or "wolf," serves an essential role as a large predator within the Treaty Territories, maintaining balance and health in the populations of prey species and protecting plant communities from overgrazing, thereby supporting the Commission's member Tribes' ability to accept the gifts of the plant and animal beings necessary to fulfill medicinal, cultural, subsistence and commercial needs; and
- WHEREAS, Ma'iingan is recognized as the brother of the Anishinaabe within the original instructions, and a being with whom the Anishinaabe share a common fate, with Ma'iingan communities flourishing throughout the North American continent prior to settlement by European immigrants; and
- WHEREAS, policies and practice of the United States, and the individual states, led to the near extirpation of Ma'iingan from the lower 48 states, until such time that Ma'iingan communities were listed as endangered and threatened under the Endangered Species Act, thereby protecting Ma'iingan from state-sanctioned hunting and trapping; and
- WHEREAS, Ma'iingan has not yet recovered in vast portions of his/her original homeland in North America; and

WHEREAS, some state management plans continue to include population goals and other objectives that reflect historical misunderstandings of Ma'iingan and undercut further recovery of the species; and

WHEREAS, the U.S. Fish and Wildlife Service proposes to remove Endangered Species Act protections for Ma'iingan.

THEREFORE BE IT RESOLVED; that the Great Lakes Indian Fish and Wildlife Commission does hereby declare its opposition to the removal of Ma'iingan from the List of Endangered and Threatened Wildlife as proposed in the March 15, 2019 Federal Register.

BE IT FUTHER RESOLVED; that the Great Lakes Indian Fish and Wildlife Commission opposes the recreational harvest of Ma'iingan by any method.

BE IT FUTHER RESOLVED; that the Great Lakes Indian Fish and Wildlife Commission urges the Fish and Wildlife Service to support tribal management by designating reservations and an appropriate buffer as tribal stewardship areas where Ma'iingan stewardship would be determined by the Tribe.

BE IT FURTHER RESOLVED; that the Great Lakes Indian Fish and Wildlife Commission supports a healthy and thriving Ma'iingan population within the Treaty Territories as a necessary component of healthy ecosystems, and supports allowing Ma'iingan populations to reach their natural carrying capacity on the landscape.

CERTIFICATION

I, the undersigned, as Secretary of the Great Lakes Indian Fish and Wildlife Commission hereby certify that the Great Lakes Indian Fish and Wildlife Commission Board of Commissioners is composed of 11 members, of whom members, constituting a quorum, were present and voting at a meeting hereof duly called, noticed, convened, and held on the 05th day of May, 2019; that the foregoing resolution was duly adopted at said meeting by an affirmative vote of 7 members; 0 against; and 0 abstaining, and the said resolution has not been rescinded or amended.


Secretary, GLIFWC Board of Commissioners