

1023 Gaither Road
Rockville, Maryland 20850

29 April 2021

The Honorable Deb Haaland
Secretary of the Interior
Department of the Interior
1849 C. Street, NW
Washington, D.C. 20240

Dear Secretary Haaland,

From 2001 to 2017, I was a historian with the Office of Federal Acknowledgment in the Office of the Assistant Secretary of Indian Affairs. In my last 5 years at the office, I was a peer reviewer on the finding for federal acknowledgment for the Southern Sierra Miwuk Nation and the editor and historian on the finding for the Grand River Band of Ottawa Nation. The Southern Sierra Miwuk have now been on active consideration for their finding for almost 11 years and the Grand Band of Ottawa for almost 8 years. No tribe should have to endure such a wait for the Department to reach a decision on a petition for federal acknowledgment. Such delays can only harm the social, economic, and cultural life of these Indian tribes which desperately need the sovereignty and resources the federal government can give them to support their communities.

In 2019, I contributed an article for Indianz.com (copy attached) that described the indefensible treatment that the Southern Sierra Miwuk Nation and its petition endured from the Office of Federal Acknowledgment. Before I left in October 2017, the office, after almost eight years of evaluation, had drafted and sent to the Solicitor review, a 200-page proposed finding on the tribe in which the staff had reached majority, affirmative conclusions on all seven of the mandatory criteria for Federal acknowledgment. Despite the strong evidence for the tribe's continuous existence, the Assistant Secretary for Indian Affairs in November 2018 issued a 25-page proposed negative finding on the tribe, which evaluated only the single criterion for "community" and only for 29 years (1982-2011) of the tribe's long history.

As I pointed out in my article, I was shocked by this radical reversal and unauthorized finding and by the meager argument to support it, and at once sent comments (copy attached) to the Assistant Secretary contesting the decision. The article I wrote and the comments I supplied for Indianz.com will give all the details on the petition for the Southern Sierra Miwuk.

Unfortunately, the Grand River Band of Ottawa Nation has suffered similarly at the hands of the Office of Federal Acknowledgment. When I left the office, my team and I had drafted and sent to the Solicitor for review a 275-page proposed finding on the tribe in which the staff had also reached majority, affirmative conclusions on all seven of the mandatory criteria for federal acknowledgment. The draft's findings were supported by over 375 references and over 75 pages

of bibliographical citations. Despite the positive finding and the strong evidence to support it, the petition is currently suspended, and the Grand River Band of Ottawa Nation is still awaiting a decision after 8 long years of active consideration.

Frankly, I cannot imagine what excuse or explanation the Office of Federal Acknowledgement has for such unreasonable, unconscionable delays in the cases of the Grand River Band of Ottawa and the Southern Sierra Miwuk. These delays make a mockery of the Department's long-standing efforts to make the federal acknowledgment process and criteria, to paraphrase Assistant Secretary for Indian Affairs Kevin Washburn in the revised 2015 regulations, more transparent, consistent, timely, and efficient.

I believe the Southern Sierra Miwuk and the Grand River Band of Ottawa are and always have been Indian tribes. The evidence I examined for the original positive recommendations for them clearly showed they were. I believed they deserved federal acknowledgment then, as did most of my OFA colleagues, and I believe that now. I ask that you ensure the Office of Federal Acknowledgment treats both these tribes and their petitions for federal acknowledgment with the fairness and the respect due them as historically important, continuously existing Indian tribes. They deserve the right to self-determination, self-governance, and federal acknowledgment. I am hopeful that you and Assistant Secretary for Indian Affairs Bryan Newland will examine all the evidence for these two tribes, including the original positive recommendations, and acknowledge them as Indian tribes.

Sincerely Yours,

/s/ Aldo E. Salerno

Aldo E. Salerno, Ph.D.