



May 13, 2019

Public Comments Processing
Attn: FWS-HQ-ES-2018-0097
U.S. Fish and Wildlife Service Headquarters
MS: BPHC
5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: FWS-HQ-ES-2018-0097-0001 - Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*) from the List of Endangered and Threatened Wildlife

On behalf of the Congressional Sportsmen's Foundation (CSF), I write today to provide comments on the U.S. Fish and Wildlife Service's proposed rule to remove the gray wolf from the List of Endangered and Threatened Wildlife.

Established in 1989, CSF works with the Congressional Sportsmen's Caucus (CSC), the largest, most active bipartisan caucus on Capitol Hill with nearly 250 members of Congress. Fifteen years ago, CSF extended the legislative network from Washington, DC to states across the country, establishing the bipartisan National Assembly of Sportsmen's Caucuses, which today is made up of 49 state legislative caucuses, and includes over 2,500 legislators. Ten years ago, CSF established a bipartisan Governors Sportsmen's Caucus, which includes more than half the governors from throughout the country. Together, this collective force of bipartisan elected officials work to protect and advance hunting, angling, recreational shooting and trapping for the nearly 40 million sportsmen and women who spend \$90 billion annually on our outdoor pursuits. This national reach also provides us with unique perspective on the impact that the state-federal relationship has on cooperative wildlife conservation efforts.

CSF requests that the following factors be considered when determining the future of the proposed rule:

Transferring management-authority of recovered species to state control is fundamental to the credibility of the Endangered Species Act

According to the U.S. Fish and Wildlife Service (Service), the purpose of the Endangered Species Act (ESA) is to "protect endangered and threatened species, and then pursue their recovery and conserve candidate species and species-at-risk so that listing under the ESA is not necessary." After these objectives have been achieved, the logical next step is to return the authority to manage recovered species to state fish and wildlife agencies that are largely responsible for increasing wildlife populations across the country for the past century. In the case of the gray wolf, federal agencies – working in partnership with states, non-governmental organizations, private landowners and others – have used sound science to determine that decades of work to develop and successfully implement recovery plans that ensure the long-term viability of the species in accordance with the requirements of the ESA. Given the time, resources, and expertise applied to recovery, failing to return the gray wolf to state management as a recovered species would raise serious questions about the effectiveness of the ESA.

Considering that the Service's most recent recovery report states that upwards of 2,200 species are currently listed and only 54 have been de-listed since the ESA was codified into law, we find these questions to be legitimate and are supportive of efforts to improve this track record. Ensuring that recovered species are returned to state management in a timely and efficient manner advances this objective by demonstrating that cooperative work amongst a multitude of partners can indeed lead to success.

States are equipped to manage the gray wolf and safeguards are in place

Through various legislative actions and regulatory processes, states have demonstrated a commitment to long-term, ongoing wolf recovery and conservation. In Idaho, Montana and Wyoming where wolves have been removed from the Endangered Species List, state wildlife managers have successfully maintained populations well above the minimums identified in Service-approved wolf recovery and management plans since de-listing. Upon de-listing, we are confident that the take of wolves in California, Michigan, Minnesota, Oregon, Washington and Wisconsin will be carefully regulated to fit these states' needs while monitored to ensure robust populations consistent with their respective recovery plans. The ESA's statutorily-required five-year status review process represents an additional incentive for state managers to ensure compliance with approved population objectives with oversight from the Service. If populations are not maintained sufficiently or state laws and regulations are modified in a way that could threaten wolf recovery, the Service retains the ability to consider re-listing through the existing regulatory process or on an emergency basis.

Great Lakes gray wolves have exceeded recovery goals

In its 1992 Revised Recovery Plan for the Eastern Timber Wolf, the Service defined a Minnesota population goal of 1,251 – 1,400 individuals spread across 40% of the state for Minnesota and 100 individuals each for Michigan and Wisconsin, respectively. Recent surveys suggest there are now well over 2000 wolves in Minnesota, and Michigan and Wisconsin have exceed their targets of 100 individuals each year since 1996. Paired with robust populations eastern Canada (12,000 – 14,000 individuals), demonstrated connectivity to Great Lakes metapopulations, thorough analysis of habitat availability, prey availability, adaptability recovery activities and expected de-listing regulatory mechanisms, there is sufficient information to conclude that gray wolves in this region are not in danger of extinction now or in the foreseeable future.

Summary

CSF appreciates the Service's rigorous evaluation of gray wolf's status and supports the conclusion that gray wolves have recovered to the point that ESA protections are no longer necessary. We encourage the Service to finalize the proposed rule and restore management of the gray wolf to state fish and wildlife agencies that are best-suited to conserving the species in a manner that considers the needs of people, wildlife and other public trust resources.

Sincerely,

A handwritten signature in black ink that reads "Jeff Crane". The signature is written in a cursive, flowing style.

Jeffrey S. Crane
President