



National Association of Conservation Districts

May 14, 2019

The Honorable Margaret Everson
Principal Deputy Director, U.S. Fish and Wildlife Service Exercising the Authority of the
Director for the U.S. Fish and Wildlife Service
U.S. Fish and Wildlife Service
1849 C Street NW, Room 3331
Washington, DC 20240-0001

Docket ID No.: FWS-HQ-ES-2018-0097-0001

Submitted online at <http://www.regulations.gov>

RE: Endangered and Threatened Wildlife and Plants; Removing the Gray Wolf (*Canis lupus*)
from the List of Endangered and Threatened Wildlife

Ms. Everson:

The National Association of Conservation Districts (NACD) represents America's 3,000 locally-led conservation districts, working with millions of landowners and operators to help them manage and protect land and water resources on private and public lands. Established under state law, conservation districts share a single mission: to work cooperatively with federal, state and other local resource management agencies, and private sector interest groups to provide technical, financial and other assistance to help landowners and operators apply conservation to the landscape at the local level.

Conservation districts nationwide remain actively engaged in support of conservation practices for listed species, proposed plans and candidate species for listing under the Endangered Species Act (ESA). Regarding the proposed delisting of the gray wolf population, NACD is encouraged to see the U.S. Fish and Wildlife Service (Service) taking a proactive step using the best available scientific data to determine the wolf population no longer meets the definition of an endangered or threatened species under the ESA.

Before providing the gray wolf protection under the ESA, wolf populations were down to about 1,000 animals in Minnesota.¹ Currently, Minnesota is estimated to have 2,423 wolves roaming its lands.² In 2018, Wyoming marked the 17th consecutive year it exceeded the numerical, distributional and temporal delisting criteria established by the Service, demonstrating the state can adequately manage the species.³

In 2018, the Wyoming Game and Fish Department implemented a wolf hunting season intending to reduce the wolf population in the Wolf Trophy Game Management Area. In total, 43 (39 legal

¹ <https://www.latimes.com/nation/la-na-gray-wolves-protection-20190306-story.html>

² <https://www.dnr.state.mn.us/mammals/wolves/mgmt.html>

³ Wyoming Game and Fish Department, U.S. Fish and Wildlife Service, National Park Service, USDA-APHIS-Wildlife Services, and Eastern Shoshone and Northern Arapahoe Tribal Fish and Game Department. 2019. Wyoming Gray Wolf Monitoring and Management 2018 Annual Report. K.J. Mills and Z. Gregory, eds. Wyoming Game and Fish Department, 5400 Bishop Blvd. Cheyenne, WY 82006.



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and four illegal) wolves were killed during the hunting season. During a similar time, wolves were confirmed to have killed 71 heads of livestock (55 cattle, 15 sheep and one horse).⁴ In 2018 alone, over \$1.5 million was spent within Wyoming on wolf monitoring and management activities.⁵

The species has shown resiliency to changes in habitat and catastrophes. Because of this, NACD opposes any relocation efforts of wolves that have been raised in human-controlled environments. Should this delisting not occur, NACD supports compensation for losses in livestock or any other negative impact on natural resources caused by the federally protected wolves.

NACD appreciates the Service acknowledging the ability of Minnesota, Wisconsin and Michigan to maintain an abundance of the Great Lakes wolf populations for the foreseeable future.⁶ The incorporation of local knowledge during the delisting process will be immensely beneficial to the Service. NACD is always supportive of decisions made as close to the local or state level as possible and applauds the Service's efforts to remove the gray wolf from the threatened or endangered list. State-level decisions over what regulations are required on wolf management allow for greater local control over the protection of the species. Certainty should be the Service's primary goal when reviewing the proposed rule and its effect on landowners. It is crucial for local government to be able to assist farmers, ranchers and landowners in the recovery and management of the species.

NACD is encouraged by the Service utilizing its full authority under the ESA to address the gray wolf population. We and our members can and will gladly work as the local landowner and stakeholder conduit to ensure voluntary conservation practices on private and public land can prevent the return of the gray wolf to the threatened or endangered species list. Lastly, NACD would like to reaffirm that all species of wildlife are the property of the states unless explicitly designated by an act of Congress.

Thank you for the opportunity to participate and submit comments on the proposed removal of the Gray Wolf (*Canis lupus*) from the list of endangered and threatened wildlife. We appreciate your consideration and look forward to continuing to work with you in the future for the protection and management of this species.

Sincerely,

A handwritten signature in black ink that reads "Tim Palmer".

Tim Palmer
President
National Association of Conservation Districts

⁴ *Id.*

⁵ *Id.*

⁶ <https://www.regulations.gov/document?D=FWS-HQ-ES-2018-0097-0001>