



Friends of Minnesota Scientific & Natural Areas

A Minnesota Non-profit, Tax-exempt Corporation
www.snafriends.org

July 9, 2019

U.S. Fish and Wildlife Service
Public Comments Processing
Attn: Docket No. FWS-HQ-ES-2018-0097
MS: BPHC
5275 Leesburg Pike
Falls Church, VA 22041-3803.

Via E-mail and U.S. Mail

Re: U.S. Fish and Wildlife Service – Proposal to delist the Gray Wolf, in the lower 48 states,
from the “List of Endangered and Threatened Wildlife”

Please Withdraw the Delisting Proposal

Dear Fish and Wildlife Service,

Thank you for the opportunity to comment on the U.S. Fish and Wildlife Service’s proposal to delist the Gray Wolf in the lower 48 states from protection under the Endangered Species Act.

Friends of Minnesota Scientific and Natural Areas (FMSNA) is a Minnesota non-profit, tax-exempt [“501(c)(3)”] corporation whose mission is to advocate for the protection, management, and perpetuation of Minnesota’s Scientific and Natural Areas (SNAs) in an undisturbed natural state. SNAs are the crown jewels of Minnesota’s state land base.

FMSNA **opposes** the delisting of the Gray Wolf in the lower 48 states and requests that the U.S. Fish and Wildlife Service **withdraw this proposal**.

The mission of FMSNA is entirely consistent with the SNA program’s statutory purpose, as stated in Minn. Stat. 86A.05, Subd. 5(a): “A state scientific and natural area shall be established to protect and perpetuate in an undisturbed natural state ...” Wolves exist within many of Minnesota’s 168 SNAs. For an intact SNA ecosystem to exist, wolves must remain **undisturbed**.

FMSNA also recognizes and supports the Minnesota Constitution, including Article XIII, Section 12, which states: “Hunting and fishing and the taking of game and fish are a valued part of our heritage that shall be forever preserved for the people and shall be managed by law and regulation **for the public good**.” [Emphasis added.] Consistent with this section, the “public

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good” is to protect Minnesota’s wolves from sport hunting and trapping. As explained below, the “public good” is not well served if wolf management, by the State of Minnesota, is inadequate to protect Minnesota wolves from being be relisted again as “endangered” or “threatened.”

Wolves occupy less than 10% of their historic range in the lower 48 states. State management in most cases, including Minnesota, is not focused on the taking of problem wolves. Instead, the last time wolves were delisted (2012), the State of Minnesota instituted “recreational” wolf hunting and trapping seasons the very same year. (Any wolf was fair game, regardless of whether it was a “problem” wolf.) As a result of Minnesota’s inadequate management of wolves, the Humane Society of the United States filed a lawsuit, resulting in the reinstatement of Minnesota’s wolves as a “threatened” species under the Endangered Species Act. [Humane Society of the U.S. v. Jewell, 76 F. Supp. 3d 69, 110 (D.D.C. 2014). Vacatur upheld on appeal Humane Society of the U.S. v. Zinke, 865 F.3d 585 (D.C. Cir. 2017).” (84 Federal Register 9650.)]

There is a “pent up demand” to shoot and trap wolves for sport, wolves that are not “problem wolves” for farmers and pet owners. (This “pent up demand” was fully evidenced during my attendance at the public hearing in Brainerd, MN on June 25, 2019.) The State of Minnesota’s regulatory structure has not substantially changed since the last time wolves were under state management. The State of Minnesota has not stated how wolf management will be different this time. The 2019 Minnesota Legislature failed to pass a bill (HF 1327), which would ban the sport hunting and trapping of wolves. (The language in HF 1327 was approved by the House as part of the Omnibus Environment bill. However, the companion bill, SF 927, was not included in the Senate Omnibus Environment bill. A conference committee did not include the House language and thus, it was not part of the Omnibus Environment bill, signed in the Special Session as Chapter 4.) Therefore, inadequate state management will most likely result, again, in relisting the Gray Wolf as a “threatened” or “endangered” species under the Endangered Species Act.

On behalf of Friends of Minnesota Scientific and Natural Areas, I thank you in advance for **withdrawing** the delisting proposal for the Gray Wolf in the lower 48 states.

Very truly yours,

Thomas E. Casey

Thomas E. Casey, Board Chair
Friends of Minnesota Scientific and Natural Areas

Please reply to:

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