



THE WILDLIFE SOCIETY

Leaders in Wildlife Science, Management and Conservation

11 February 2021

Public Comments Processing
Attn: FWS-HQ-ES-2020-0102
U.S. Fish and Wildlife Service
MS:JAO/3W
5275 Leesburg Pike
Falls Church, VA 22041-3803

Re: Endangered and Threatened Wildlife and Plants; Regulations for Interagency Cooperation

The Wildlife Society appreciates the opportunity to comment on the newly proposed modifications to the federal agency consultation process under Section 7 of the Endangered Species Act (ESA). The proposed changes will serve to reduce the workload on wildlife professionals, while continuing to ensure that the consultation process – a cornerstone of the ESA – functions to protect listed species and habitat.

Founded in 1937, The Wildlife Society (TWS; wildlife.org) and our network of affiliated chapters and sections represents over 15,000 wildlife biologists and managers, dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and their habitat through science-based management and conservation.

The Section 7 interagency consultation process is the primary means by which the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) work with other federal agencies to ensure proposed federal actions are not likely to jeopardize listed species or affect designated critical habitat. Consulting agencies include the Bureau of Land Management (BLM) and the U.S. Forest Service (USFS), which together manage approximately 438 million surface acres of federal lands.

Pursuant to federal law, USFS and BLM regularly prepare land management plans for their federal land units. The development of land management plans generally requires consultation with USFWS under Section 7, and plan updates are intended every five to fifteen years.

Occasionally, new information about the effect of a land management plan on ESA-listed species or designated critical habitat will become available between plan revisions. **Under the proposed changes, federal managers will not have to undergo time-intensive consultations and overhauls of the entire land management plan in order to consider these effects.** If an action authorized in the plan is determined to potentially impact a listed species or critical habitat, a separate consultation under Section 7 will still be undertaken.

Providing clarity about when BLM and USFS are required to reopen land management plans will also serve to clarify responsibilities for agency staff, make the consultation process more understandable and accessible for the general public, and may serve to reduce litigation surrounding land management plans. This will allow a more effective and streamlined

interagency consultation process and reduce the time that federal wildlife professionals must devote to potential litigation.

Thank you again for the opportunity to comment. We look forward to the implementation of these regulatory changes in order to allow wildlife professionals within the USFWS, NMFS, BLM, and USFS to focus their efforts and advance the conservation of threatened and endangered species across the country.

Please contact Caroline Murphy, AWB®, government relations manager at The Wildlife Society (cmurphy@wildlife.org; 301-968-1903), with any questions regarding our comments above.

Sincerely,

A handwritten signature in cursive script that reads "Carol L. Chambers".

Carol L. Chambers, PhD
President, The Wildlife Society