



31 July 2018

The Honorable John Barrasso, M.D.  
Chairman, Senate Committee on Environment and Public Works  
United States Senate  
410 Dirksen Senate Office Building  
Washington, D.C. 20510

RE: Endangered Species Act Amendments of 2018 discussion draft legislation

Dear Chairman Barrasso,

The National Wild Turkey Federation is pleased to offer support for the Endangered Species Act Amendments of 2018. The NWTF is a national non-profit organization dedicated to the conservation of the wild turkey and the preservation of our hunting heritage. Our 230,000 members nationwide support species conservation and conservation projects on public and private lands across the country. We applaud your efforts to update the Endangered Species Act to improve its effectiveness in recovering species, the ultimate goal of the Act.

Through our efforts to help agencies like the USDA Forest Service implement quality conservation on the ground, we have seen firsthand the challenges created by 40 years of legal interpretation of ESA and the agency guidelines and practices that have been a result. This has resulted in an inefficient process that hinders the ability to get work done in a timely manner. In the case of active forest management, this can often contribute to unhealthy forests that are more susceptible to wildfire, insects and disease. A modernization of the ESA is overdue.

In reviewing the discussion draft, it is evident that many of the proposed amendments are based largely on recommendations that were outlined in the Western Governors Association Species Conservation and the Endangered Species Act Initiative report and on the Association of Fish and Wildlife Agencies' (AFWA) General Principles for Improving Implementation of the Endangered Species Act. The NWTF was involved with the development, and previously endorsed, both of these sets of recommendations. We particularly appreciate your efforts to elevate the role and involvement of state wildlife agencies. These agencies have the responsibility to manage the wildlife of the state, and must be fully engaged in decisions regarding ESA listing, recovery, and delisting. In addition, these agencies often have the best available information for informing decisions. Having the state agencies more integrated in the entire process will create more local buy-in and investment and will lead to greater success in recovering populations.

As this legislation is considered, we urge you to further consider the role that interagency consultation under Section 7 plays in Federal land management decisions. In particular, we suggest evaluating the role that other federal agency biologists, who are experts in the interaction between land management decisions and the potential impacts to a species on their property, can play in making determinations on "not likely to adversely affect" listed species.

National Wild Turkey Federation

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This is one way that more timely completion of necessary consultation can be made, so that management beneficial to the species can be implemented.

Thank you for your leadership to improve the Endangered Species Act. Responsible reforms of the ESA are long overdue, but like the bipartisan forest management items you successfully secured in the Omnibus, it will take Democratic support to get the bill moving and to the President's desk. We urge you to continue to seek counterparts willing to work towards a bipartisan bill.

We believe that the amendments contained in the discussion draft will make significant improvements to ensure that the ESA is a foundation for the recovery of species, and not just for the listing of species. Thank you for your leadership on this issue. We look forward to working with you and the committee as the legislation moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca A. Humphries". The signature is fluid and cursive, with a large initial "R" and "H".

Rebecca A. Humphries  
Chief Executive Officer