



September 17, 2015

Via [www.regulations.gov](http://www.regulations.gov)

Public Comments Processing  
Attn: Docket No. FWS-HQ-ES-2015-0016  
U.S. Fish & Wildlife Service  
MS: BPHC  
5275 Leesburg Pike  
Falls Church, VA 22041-3803

**Re: Endangered and Threatened Wildlife and Plants; Revisions to the Regulations for Petitions (Docket No. FWS-HQ-ES-2015-0016)**

Dear Sir or Madam:

The Interstate Natural Gas Association of America (INGAA), a trade association that advocates regulatory and legislative positions of importance to the interstate natural gas pipeline industry in North America, respectfully submits these comments in response to the U.S. Fish and Wildlife Service (the Service)'s Proposed Rule to clarify and enhance the procedures by which the Service evaluates petitions to list, reclassify, or delist a species from the Federal List of Endangered and Threatened Wildlife or List of Endangered and Threatened Plants.<sup>1</sup>

INGAA supports the Service's proposed changes to the petition process. INGAA agrees with the Service's proposal to no longer accept multi-species petitions. This change will streamline the process and enhance the efficiency of the Service's review.

INGAA also agrees with the Service's proposal to require petitioners to consult with states prior to filing a petition. States should have an active role in the process. State conservation agencies often maintain data on species within their borders, which the Service may not have readily available. Therefore, it is critical that the Service require petitioners to consult with the appropriate state office prior to submitting a petition for the Service's review. INGAA supports the inclusion of this additional step to ensure that all listing and reclassifying decisions are based on sound science.

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<sup>1</sup> Endangered and Threatened Wildlife and Plants; Revisions to the Regulations for Petitions, 80 Fed. Reg. 29286 (May 21, 2015). *See also*, 16 U.S.C. § 1531 *et seq.*

Finally, the Service should consider expanding the time a state has to review and provide additional data. The Service states in its proposal that petitioners must certify that they have sent a copy of the petition to relevant states 30 days prior to submission to the Service. However, 30 days is not enough time. INGAA recommends that the Service expand the time allowed to 60 days in order to ensure that all listing decisions are based on the best scientific data available.

INGAA appreciates the Service's review of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "BKurdock", with a long horizontal flourish extending to the right.

Brianne Kurdock  
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