



LOUISIANA WILDLIFE FEDERATION

The voice of Louisiana's wildlife and natural resources since 1940.

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Public Comments Processing
Attn: FWS-R4-ES-2020-0109
U.S. Fish and Wildlife Service
MS: PRB/3W
5275 Leesburg Pike
Falls Church, VA 22041-3803

To Whom It May Concern:

I am writing on behalf of Louisiana Wildlife Federation to assert that it is too early to declare delisting of the Ivory-billed Woodpecker. Before delisting, a thorough review of all of the files and sources needs to be done. These sources include reports from credible ornithologists. The 2010 Ivory-billed Woodpecker Recovery Plan contains a detailed compilation of over 100 reports between 1944 and 2003. Even allowing for multiple observations it suggests a large number of reported individuals (up to 200) and would infer a need for explanation why they have been discounted.

The US Fish and Wildlife Service finding of an Ivory-billed Woodpecker in Arkansas 2004-2005 has not been reversed. Photographs from 2009 showing two Ivory-billed Woodpeckers in Louisiana also need to be well reviewed. Therefore, it is impossible to arrive at an accurate tally of the number that exists. In addition, it would be necessary to complete further coordinated studies that should be developed by a committee comprising of the individuals who have knowledge of what has been done in the recent past.

In the latest issue of *Arkansas Wildlife* (Jan-Feb 2022), reference is made to the book "The Ivory-billed Woodpecker: Taunting Extinction" in which author Guy G. Luneau cited examples of more recent sightings using ANOVA numerical statistics to confirm 2009 photographs as Ivory-billed woodpeckers rather than Pileated Woodpeckers.

Until adequate surveys have been completed, delisting would only discourage continued searching. Louisiana Wildlife Federation urges the USFWS to not delist the Ivory-billed Woodpecker at this time.

Louisiana Wildlife Federation is a statewide, nonprofit organization that represents 18 affiliate organizations and more than 6,800 members dedicated to the conservation of Louisiana's wildlife and natural resources. Thank you for your consideration of these comments.

Sincerely,

Rebecca Triche, Executive Director