



PUBLIC COMMENT

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**Re: Document 79 FR 65980, Publication Date: Thursday, November 06, 2014,**  
**Applicant: Corey Knowlton of Royse City, TX**  
**PRT-33291B**

December 4, 2014

To Whom It May Concern:

As part of a larger program of support for the conservation of the critically endangered black rhino, Dallas Safari Club announced plans in the fall of 2013 to auction a single black rhino hunting permit on behalf of the Government of the Republic of Namibia, in full compliance with CITES and the United States Fish and Wildlife Service protocols. This was not a decision that was made lightly, or without careful review of existing scientific evidence regarding the merits of this action. On January 11<sup>th</sup> of this year, during its annual convention, Dallas Safari Club raised \$350,000 directly from the sale of this permit. By doing so, the organization undertook a practical step in advancing conservation efforts for this iconic species. Despite conflicting viewpoints, we remain committed to this process and urge the U.S. Fish and Wildlife Service to approve the required import permit.

We further urge you to consider that one hundred percent of the money raised in this auction will be designated and restricted for black rhino conservation and research. These funds will be used to augment ongoing rhino conservation projects in Namibia, geared towards scientific research, and the crucial task of reducing the indiscriminate slaughter of these animals by increasingly sophisticated poaching cartels. While there are numerous challenges facing black rhino populations, no one can doubt that it is the unsustainable off-take of mature animals for commercial marketing of their keratinous horn that threatens to undermine all previous recovery efforts for this species, and which, if left uncontrolled, will lead to the animal's extinction in the wild. The monies raised through legal trophy hunting opportunities are critical to supporting the Namibian government in their efforts to stem

the tide of commercial killing of these animals and we believe that every effort must be advanced to achieve this goal.

It should be recognized that the auctioned permit is highly specific as to the animal that may be killed, and is not in any sense comparable to a general license to hunt this species. In this highly regulated circumstance, the permitted hunter is restricted to taking only a single, aged, non-breeding male, that has previously been identified as overtly aggressive, and which poses a serious threat to herd growth and sustainability. Such animals often charge and kill younger bulls, cows, and also calves. These facts are well substantiated in the literature, and are very much at the core of this strategic effort to both reduce natural herd mortality and augment anti-poaching and research efforts.

We recognize and are sensitive to the fact that the global black rhino population is listed as highly endangered, and that every effort must be made to ensure that measures taken for its recovery be transparent and pass the careful scrutiny of leading authorities in rhino conservation. Indeed, it is in this light that we recommend for consideration the broad scientific evidence in support of removal of problem animals that are deemed to be threats to the continued well-being of larger rhino groups. At current population levels, the well being of even small numbers of animals is critical to conservation of this species. All forms of additive mortality, including natural mortality due to aggressive dominant male individuals, must be addressed in a manner that adds to stabilization and growth in numbers.

We further point out that CITES, the leading international scientific authority on trade in endangered species, supports limited rhino hunting as an acceptable conservation tool, as does the IUCN, the United Nations environmental body that hosts the greatest scientific and management expertise for this species. CITES has granted Namibia an annual export quota of up to five hunter-taken black rhinos, explicitly acknowledging the validity and conservation benefits of limited and regulated hunting, even of a rare species. We also note that the IUCN Rhino Specialist Group, as well as the IUCN Sustainable Use and Livelihoods Specialist Group, provided detailed and unequivocal letters of support for the rhino auction and for the process of engaging regulated trophy hunting of individual post-reproductive male rhinos as a legitimate and effective means of assisting rhino conservation programs.



Dallas Safari Club appreciates that some groups are opposed to this sustainable use approach, expressing frustration over hunting generally and, in this instance, the hunting of an iconic endangered species, especially. However, we argue strongly that philosophical sentiment and good will are certainly not sufficient to deal with the perilous state of the black rhino populations today. The threats to these animals will not disappear should legal hunting be prohibited; but what certainly would result is the loss of an effective means to raise critically needed funds to support conservation science and wildlife enforcement efforts, as well as an instrument for legal removal of individual animals that are capable of holding back natural increases in rhino numbers.

It is our position that we must rely on science and reason to ultimately determine wildlife management policy, a long accepted practice that has led to extraordinary conservation achievements in many parts of the world. We cannot throw conservation into the jaws of opinion on either side of the sustainable use debate, or the results for wild species will be catastrophic. Furthermore, we require practical solutions to today's highly complex conservation problems; wishing strongly for events to improve or suggesting impractical means to achieve our goals cannot be entertained when we are faced with dire consequences, should our efforts fail.

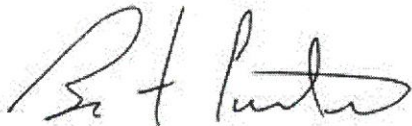
There is overwhelming evidence in support of regulated legal hunting as one means of assisting in wildlife conservation, for both recovering species from low numbers and for maintaining sustainable populations once numbers improve. We need only look at our experiences here in North America over the last century and a half to support this conclusion; and certainly there can be no debate whatsoever of the immediate and critical need for increased rhino conservation funding at this time. We need to do everything in our power to assist the Namibian government in their efforts to recover and protect this species.

We must also acknowledge, collectively, that circumstances facing the black rhino have deteriorated since the Dallas Safari Club auction of a year ago; and most informed parties predict they will worsen further before any improvement is likely to occur. Experts also agree that, to this point in time, poaching losses have largely removed any growth potential

for black rhino numbers, but that we are very close to, or have already entered, a phase where the number of rhinos will actually decline.

The Dallas Safari Club remains absolutely convinced that the revenue from last year's convention auction will directly benefit black rhino recovery efforts, and that the trophy import process now under review must be sanctioned. To disallow this process can only lead to further proliferation in the already rampant and brutal poaching practices that are becoming increasingly entrenched in the regions where black rhinos exist, and to declines in the numbers of black rhinos themselves. While our efforts to assist the Namibian government are only one step in a very long and complicated process, we encourage the Fish and Wildlife Service to approve this importation permit so that the good work our funds will support can go forward. We all need to do what is best for this animal and set aside debates that, at this point, cannot be afforded if we are to achieve our goals for conservation of this species.

Respectfully Yours,

A handwritten signature in black ink, appearing to read "Ben F. Carter". The signature is fluid and cursive, with the first name "Ben" and last name "Carter" clearly distinguishable.

Ben F. Carter  
Executive Director  
Dallas Safari Club