

## **Please withdraw the proposed changes to the Endangered Species Act regulations**

The Endangered Species Act is one of the most effective conservation laws in the United States. Ninety-nine percent of listed species have been saved from extinction, including iconic species such as the bald eagle. The law is also widely popular; polling shows that 90 percent of voters across the political spectrum support the law. The proposed changes to the statute will weaken the law and put thousands of plants and animal species at risk.

### **50 CFR Part 402**

#### **Revision of Regulations for Interagency Cooperation**

Proposed changes will allow federal agencies to not acknowledge the broad consequences of their actions through changes to the consultation requirements of Section 7 of the Act. Section 7 consultations require that a federal agency that is funding, authorizing, or conducting an activity to consult with the Fish and Wildlife Service or the National Marine Fisheries Service to ensure that the activity does not jeopardize the existence of endangered or threatened species or destroy their critical habitat. The proposed changes will reduce the effects of agency actions required to undergo consultations. For example, the proposed rule seeks comment on changes that would stop consultation for effects like climate change that are “manifested through global processes.” The changes proposed will also make it harder to protect critical habitat that is being impacted by development. The protection of even small sections of habitat is crucial for species conservation. The proposed changes would allow “death by a thousand cuts” by ignoring impacts to species’ critical habitats unless they impacted the entire habitat at once. If the mechanisms for enforcement of the protection of endangered and threatened species and their critical habitats are weakened, species will be put at greater risk.

I urge you not to move forward these proposed changes and leave the regulations to one of our most effective and popular conservation laws untouched. Please withdraw the proposed changes to section 7 (Interagency Cooperation) rule. CFR Citation: 50 CFR Part 402 / Docket ID: NOAA\_FRDOC\_0001

### **50 CFR Part 17**

#### **Revision of the Regulations for Prohibitions to Threatened Wildlife and Plants**

The changes proposed to remove the blanket protections for species listed in the future as threatened will prevent the immediate protection of plants and animals. Species listed as threatened could languish for years without any protections. The proposed regulation could also provide incentives to private landowners to eliminate species on their lands before a rule is issued. If these regulatory changes go into effect, many more species will fall from threatened to endangered, requiring more intervention from the government. Protection for threatened species needs to be maintained. We do not want more extinctions.

I urge you not to move forward with these proposed changes and to leave the regulations to one of our most effective and popular conservation laws untouched. Please withdraw the proposed changes to 4(d) (protective regulations) rule. CFR Citation: 50 CFR 17 / Docket ID: FWS-HQ-ES-2018-0007

## **50 CFR Part 424**

### **Revision of the Regulations for Listing Species and Designating Critical Habitat**

The Endangered Species Act is one of the most effective conservation laws in the United States. Ninety-nine percent of listed species have been saved from extinction, including iconic species such as the bald eagle. The law is also widely popular; polling shows that 90 percent of voters across the political spectrum support the law. The proposed changes to the statute will weaken the law and put thousands of plant and animal species at risk.

The changes proposed to remove the language that ensures listing decisions are made without considering economic impact go against the very nature of the law as it was designed. No economic consideration should be made when determining how to save a species from complete disappearance.

The changes proposed for the listing of threatened species will make it more difficult for new species, particularly those impacted by climate change to be added to the list. Protections for threatened species are crucial in ensuring that the species does not become endangered and ultimately extinct. The changes also make protection of already listed threatened species more difficult. Both of these changes will result in a much higher number of species falling closer to extinction, requiring more intervention from the DOI.

The changes proposed to the designation of critical habitat will provide many opportunities to block efforts to create protected habitat areas, particularly habitat needed to guard against climate change impacts to species. Habitat protection is one of the most crucial tools in the protection of endangered species, and habitat destruction is one of the largest driving forces behind why so many species of animals and plants see their population numbers fall.

I urge you not to move forward these proposed changes and leave the regulations to one of our most effective and popular conservation laws untouched. Please withdraw the proposed changes to section 4 (listing and critical habitat) rule. CFR Citation: 50 CFR 424 / Docket ID: FWS-HQ-ES-2018-0006