

February 26, 2019

The Honorable Nita Lowey
Chairwoman
Committee on Appropriations
U.S. House of Representatives
The Capitol H-305
Washington, DC 20515

The Honorable Kay Granger
Ranking Member
Committee on Appropriations
U.S. House of Representatives
The Capitol H-305
Washington, DC 20515

Dear Chairwoman Lowey and Ranking Member Granger,

Last month, the United States lost another species forever: a species of tree snail from Oahu whose last individual, George, died after 14 years in captivity.¹ With the shoestring budget that they had, conservationists did try to find a mate for George, but were unsuccessful. Like other losses in the ongoing biodiversity crisis, this extinction is a tragic one for the United States, a nation with the strongest wildlife conservation law in the world, the Endangered Species Act. Despite the protections the Act provides, decades of underfunding have held it back from realizing its full potential. Too many species sit in limbo at the edge of extinction — or as with George's passing — are being lost altogether, when we *can* ensure they remain part of our rich natural heritage.

On behalf of our millions of members and supporters, we request that you provide the U.S. Fish and Wildlife Service the critical funding the agency desperately requires for endangered species conservation and recovery. As we outline below, the data show that the Service requires a budget of \$486 million dollars across five programs to begin to make up for lost ground and put species on the path to recovery, starting in fiscal year 2020. Critically, this includes ensuring every listed species receives a minimum of \$50,000 per year for recovery. This funding package will allow the Endangered Species Act to be implemented in the way Congress intended when it dedicated our country to protecting the species and the habitats that need it most.

Listing

Listing a species — placing it under the Endangered Species Act's care — is the single best means of averting extinction. The Endangered Species Act is an incredible success for protecting species; 99% of listed species are still with us today. In contrast, nearly 50 unlisted species have been declared extinct while waiting for protections because of funding shortfalls. The FWS seven-year listing workplan² details how the agency will prioritize the evaluation of over 350 species for listing and is supported by many stakeholders. At current funding rates, it will take the Fish and Wildlife Service at least 10 years to process all of the remaining species that the agency has identified as potentially needing protection under the Act. Based on the time and cost required to evaluate species for listing and status changes (such as delisting), we recommend increasing the listing program budget to \$51 million in 2020 and thereafter. This

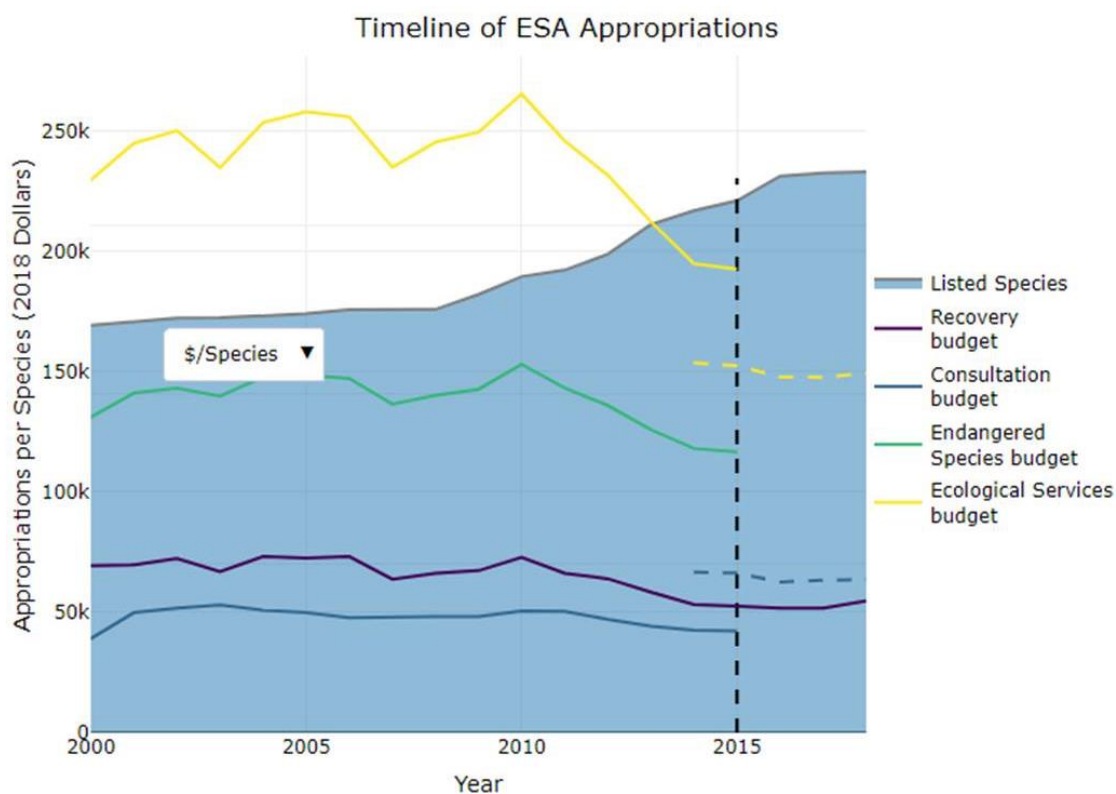
¹ See National Geographic, *Lonely George the tree snail dies, and a species goes extinct* (Jan. 8, 2019) available at: <https://www.nationalgeographic.com/animals/2019/01/george-the-lonely-snail-dies-in-hawaii-extinction/>.

² U.S. Fish and Wildlife Service, National Listing Workplan, 7-year workplan (Sept. 2016) available at: <https://www.fws.gov/endangered/esa-library/pdf/Listing%207-Year%20Workplan%20Sept%202016.pdf>.

recommendation is three times current funding and would allow the Service to process the entire listing backlog in less than four years. To ensure species receive the detailed scientific analyses they need to determine if they need to be protected by the Act, we urge Congress to fully fund the listing program.

Recovery

The Service’s recovery program includes planning for recovery, implementing recovery actions, and tracking recovery progress. Because funding drives recovery progress, it is essential to provide sufficient resources for the recovery program: it is how the Service can ensure threats are minimized or removed so species are conserved. Unfortunately, recovery appropriations have been essentially flat over the past two decades, and when controlling for inflation and the number of listed species, have declined since 2010 (purple line):



Endangered Species Act funding for the U.S. Fish and Wildlife Service has remained flat and even declined since 2010. Note that the funding for two components shifts after 2014 because of budgeting changes, but does not change the overall pattern. Data from FWS, shown in inflation-adjusted 2018 dollars.

More concerning, according to the reports provided by the Fish and Wildlife Service that are required by Congress each year, hundreds of endangered species receive less than \$1000 a year for their recovery, with many receiving no funding from the Service at all.³ We strongly

³ See U.S. Fish and Wildlife Service, Federal and State Endangered and Threatened Species Expenditures (Fiscal

recommend that Congress provide a minimum of \$50,000 per year per species for recovery to make sure that no species slips through the cracks.

Accordingly, Congress can significantly reverse the slide of more animal and plants towards extinction, and put every species on a path to recovery by providing the Service with \$197 million for the recovery program in 2020, which is more than double the current—and insufficient—funding levels.⁴ This includes \$43.8 million for recovery planning, which is essential to guiding species back from the brink; \$137.8 million for recovery actions, which range from reducing poaching to invasive species control; and \$10.5 million for conservation status reviews that need to occur every five years.

Planning and Consultation

The Planning and Consultation program includes key processes that ensure species receive fundamental protections while allowing flexibility for infrastructure and other forms of development. The Service evaluates (“consults on”) the effects of over 10,000 federal actions on listed species per year to help protect species and their habitat—including conducting highly technical analyses for issues such as pesticide effects—as part this program. Over the past two decades, the Service has worked with states, counties, and private landowners across the country to create over 1,000 Habitat Conservation Plans for to help conserve species. But this program is stressed: appropriations have been flat or declining since the early 2000’s; nearly 1/5 of formal project evaluations run over deadlines; and the funding needed for conservation planning has dropped in past years, reducing the number of plans that have been completed.⁵

There are opportunities to improve the efficiency and effectiveness of these processes, such as through the widespread adoption of technologies such as the Services’ Integrated Planning and Conservation (IPaC) system and the addition of dedicated personnel to monitor compliance with the Act. For planning and consultation to be maximally effective and efficient, Congress needs to provide the Service with \$130.05 million in FY 2020 and beyond. This includes \$120 million for standard consultations; an additional \$750 thousand for pesticide consultations and \$450 thousand for IPaC development; \$7.5 million for voluntary conservation; and \$1.35 million for basic compliance monitoring that does not currently exist.

Conservation and Restoration

The Candidate Conservation component of the Conservation and Restoration program provides a key mechanism to help conserve species by improving their habitat and removing threats before they need to be listed. Early conservation action means species are more secure than waiting until species are on the brink of extinction, and it is much more cost-effective. The Service

Year 2016), available at: https://www.fws.gov/endangered/esa-library/pdf/2016_Expenditures_Report.pdf.

⁴ Evans et al., *Species recovery in the United States: increasing the effectiveness of the Endangered Species Act*, Ecological Applications (Jan. 2016), available at: https://www.researchgate.net/publication/289249207_Species_recovery_in_the_United_States_increasing_the_effectiveness_of_the_Endangered_Species_Act.

⁵ See U.S. Fish and Wildlife Service, Conservation Plans by type and U.S. FWS Region, available at: https://cci-dev.org/working_papers/agreements_overview.html.

currently has 23 candidate species designated,⁶ and assuming the cost of conserving candidate species is half of the cost and time of recovery, the Service needs \$8M for FY 2020-2024 to efficiently keep species back from the brink of needing the protections of the Act.

Cooperative Endangered Species Conservation

Congress recognized the need for the federal government to cooperate with the states and others to conserve species, and the Cooperative Endangered Species Conservation Fund (CESCF) serves as an essential source of funding for states and conservation on private lands. Critically, at least half of all listed species spend a portion of their life cycle on private lands, and we need to provide the resources to facilitate recovery by everyone.⁷ The states cannot do this alone, whether because they lack the legal tools or the funding and other necessary commitments.⁸ To reverse the gap from previous funding shortfalls and match the current need for state and private lands conservation, the Service requires CESCF funding of at least \$100,000,000 for FY 2020 and beyond.

* * *

The passing of George and the larger risk of mass extinction is a wake-up call to society and Congress that more must be done. Conserving our planet's natural heritage is a monumental challenge, but we can do more, and we know what to do for our most imperiled wildlife and plants. That means providing sufficient funding for the listing program to ensure species are recognized as imperiled; for planning and consultation to ensure basic protections are applied to species; for recovery planning and recovery work; and for collaborative work across public and private lands to ensure we work together to protect our natural heritage. The sooner we act, the more species can be saved from extinction, and the faster species can be recovered and delisted. Thank you for your consideration.

Sincerely,

All-Creatures.org
American Bird Conservancy
American Indian Mothers Inc.
Animal Welfare Institute
Animals Are Sentient Beings, Inc.
Animas Valley Institute
Association of Zoos and Aquariums
Basin and Range Watch

⁶ See U.S. Fish and Wildlife Service, Candidate Species Report, available at: <https://ecos.fws.gov/ecp/report/table/candidate-species.html>.

⁷ Stein et al., *Precious heritage: The Status of Biodiversity in the United States*, Oxford University Press (2000).

⁸ See Camacho et al., *Assessing State Laws and Resources for Endangered Species Protection* (Oct. 2017), available at: <https://www.law.uci.edu/centers/cleanr/news-pdfs/cleanr-esa-report-final.pdf>; see also Kurose et al., *Unready and Ill-Equipped: How State Laws and State Funding are Inadequate to Recover America's Endangered Species* (Feb. 2019), available at: <https://centeractionfund.org/wp-content/uploads/CBD-AF-Unready-and-Ill-equipped-State-ESA-Laws.pdf>

Battle Creek Alliance & Defiance Canyon Raptor Rescue
Bauman Foundation
Bay Area - System Change not Climate Change (BA-SCnCC)
Bedford Audubon Society
Bedford Co. Bird and Nature Club
Bird City Wisconsin
Bird Conservation Network
Black Canyon Audubon Society
Black Warrior Riverkeeper
Blue Mountains Biodiversity Project
Born Free USA
Boulder County Audubon Society
Boulder Rights of Nature
Bozeman Birders
Buffalo Field Campaign
Butterfly Farms.org
Cahaba River Society
California Native Plant Society
California Wolf Center
Californians for Western Wilderness
Cascades Raptor Center
Center for Biological Diversity
Center for Food Safety
Center for Snake Conservation
Chesapeake Wildlife Heritage
Citizens Against Ruining the Environment
Citizens Climate Lobby
Citizens Committee to Complete the Refuge
Clean Water Action
Coalition for Sonoran Desert Protection
Coast Range Association
Coastal Plains Institute
Colorado Crane Conservation Coalition
Colorado Wild Rabbit Foundation
Columbus Zoo and Aquarium
Comite Pro Uno
Conservation Congress
Conservation Northwest
Coosa Riverkeeper
Cuidados Del Karso
Cumberland-Harpeth Audubon Society
Defenders of Wildlife
Delaware Ecumenical Council on Children and Families
Delaware-Otsego Audubon Society
Delaware Valley Ornithological Club
Desert Tortoise Council

Dogwood Alliance
Earthjustice
Eastern Coyote/Coywolf Research
Eco-Eating
Endangered Habitats League
Endangered Species Coalition
Environmental Action Committee of West Marin
Environmental Committee for the San Lorenzo Valley
Environmental Investigation Agency
Environmental Protection Information Center
Eyak Preservation Council
Florida Conservation Voters
Food Democracy Now!
Food Empowerment Project
For the Fishes
Friends of Blackwater, Inc.
Friends of the Bitterroot
Friends of the Creeks
Friends of the Earth
Friends of the Eel River
Friends of the Locust Fork River
Friends of the Wild Whoopers
Friends of the Wisconsin Wolf & Wildlife
Fund for Wild Nature
Glynn Environmental Coalition
Golden West Women Flyfishers
Great Lakes Wildlife Alliance
Greater Hells Canyon Council
Greenaction for Health and Environmental Justice
Greenpeace
Gulf Restoration Network
Hands Across the Sand/Land
Hawaii Preparatory Academy
Heartwood
High Country Audubon Society
Hills For Everyone
Hilton Pond Center for Piedmont Natural History
Hoosier Environmental Council
Howling For Wolves
Humboldt Baykeeper
International Marine Mammal Project of Earth Island Institute
Iowa Audubon
Juniata Valley Audubon Society
Justice for Wolves
Kairos Earth
Kettle Range Conservation Group

Klamath Forest Alliance
Klamath-Siskiyou Wildlands Center
Kootenai Environmental Alliance
La Union Hace La Fuerza
Life of the Land
Los Angeles Audubon Society
Los Padres ForestWatch
Madison Audubon Society
Maguari-One Zoo Consultants
Maricopa Audubon Society
Mass Audubon
Massachusetts Forest Watch
Miami Waterkeeper
Mid-Michigan Stewardship Initiative
Minnesota River Valley Audubon Chapter
Missouri Coalition for the Environment
Monmouth County Audubon Society
MountainTrue
Birding Under Nevada Skies
National Parks Conservation Association
National Wolfwatcher Coalition
Native Plant Conservation Campaign
Natural Resources Defense Council
NC WARN
Northcoast Environmental Center
Northeast Oregon Ecosystems
Northern Catskills Audubon Society, Inc.
Northwest Arkansas Audubon Society
Northwest Environmental Advocates
NY4WHALES
NYC Audubon
Ocean Conservation Research
Olympic Forest Coalition
One More Generation
Oregon Natural Desert Association
Orleans Audubon Society
Pacific Beach Coalition
Pennsylvania Society for Ornithology
People for Animal Rights
Peregrine Audubon Society
Physicians for Social Responsibility, Arizona Chapter
Port Crescent Hawk Watch
Prairie Dog Pals
Predator Defense
Prince George's County Audubon Society
Public Citizen

Public Employees for Environmental Responsibility (PEER)
Raptor Services, LLC
Raptors Are The Solution
Reef Relief
Roaring Fork Audubon Society
Rockbridge Bird Club
Rocky Mountain Wild
Rootskeeper
Sacramento Audubon Society
Salem Audubon Society
San Diego Coastkeeper
San Fernando Valley Audubon Society
Sangre de Cristo Audubon Society
Santa Barbara Audubon Society
Save Animals Facing Extinction
Save Our Allegheny Ridges
Save Our Sky Blue Waters
Save the Biosphere
Save The Colorado
SAVE THE FROGS!
Save Wolves Now Network
Sequoia ForestKeeper®
Sierra Club
Skagit Audubon Society
Sustainable Arizona
Tennessee Native Plant Society
Tennessee Naturalist Program
Tennessee Ornithological Society
Trap Free Montana Public Lands
The 'Green Peace Corps'.org
The Cloud Foundation
The Cougar Fund
The Enchanted Biscuit
The Lands Council
The Rewilding Institute
The Safina Center
The Urban Wildlands Group
Toxic Free NC
Tracy Aviary
Trap Free Montana
Tucson Audubon Society
Umpqua Valley Audubon Society
Umpqua Watersheds, Inc.
Upper Peninsula Environmental Coalition
Urban Bird Foundation
Urban Growers Collective

Utah Native Plant Society
Ventana Wilderness Alliance
Vermont Center for Ecostudies
Vermont Natural Resources Council
Virginia Society of Ornithology
Washington Crossing Audubon Society
Waterkeeper Alliance
West Berkeley Alliance for Clean Air and Safe Jobs
Western Environmental Law Center
Western Nebraska Resources Council
Western Watersheds Project
Whidbey Environmental Action Network
WILD HORSE EDUCATION
Wild Nature Institute
Wildcare Eastern Sierra
WildEarth Guardians
Wilderness Workshop
Wildlife Alliance of Maine
WildWest Institute
Wolf Veterinary Services
Xerces Society for Invertebrate Conservation
Xun Biosphere Project