

Ernie-

I'll take this
home + discuss w/
Ted tonight

Ted tonight

I copied it AHS

Idaho Pres is

208-232-4703

Dick Scully
outgoing

Wayne Paradis (Incoming?)

208-983-1963

Chris,

who is Pres. of Id. Ch.
of AFS? Also, what
do you think (Ted too!)
about listing of Bull Trout?

I need to respond as
Pres. of Id. Ch. of TWS.

FAX 983-1853

Emie



THE WILDLIFE SOCIETY

5410 Grosvenor Lane • Bethesda, MD 20814-2197
Tel: (301) 897-9770 • Fax: (301) 530-2471

FACSIMILE TRANSMISSION

TO:

ERNIE ABLES (208) 885-6226 / DAN EDGE (503-737-3590)

FAX NO:

FROM:

RUTH GOLDSTEIN, WILDLIFE POLICY INTERN

FAX NO:

(301) 530-2471

We have transmitted 4 pages (including this cover page). If you do not receive all pages, please call back as soon as possible. (301)897-9770. Thank you.

MESSAGE

HERE IS THE WRITTEN TESTIMONY TWS SUBMITTED FOR
THE MAY 25 D.C. HEARING ON ESA. THIS LETTER
SUPPORTS SOME CONCLUSIONS FROM THE NRC REPORT
AND PULLS POINTS FROM TWS' DRAFT TECHNICAL
REVIEW ON EIS. YOU MAY WANT TO USE THIS FOR
GUIDANCE IF YOU SUBMIT A LETTER VIS-A-VIS
YOUR FIELD HEARINGS. THANKS.
— RUTH GOLDSTEIN

N.B. SUBSEQUENT TO THE WRITING OF THIS LETTER
TOM DECIDED OUR PRC ON "SURVIVAL HABITAT"
WASNT OF SUCH GREAT IMPORTANCE, AND MIGHT
NOT BE ADMINISTRATIVELY FEASIBLE



THE WILDLIFE SOCIETY

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6 June 1995

The Honorable Richard Pombo, Chairman
House Task Force on the Endangered Species Act
c/o House Committee on Resources
1324 Longworth House Office Building
Washington, D.C. 20515

Dear Chairman Pombo:

The Wildlife Society, representing professional wildlife biologists, would like to submit the following comments for inclusion in the official record for the 25 May hearing of the House Endangered Species Task Force.

The Endangered Species Act of 1973 and amendments represent a safety net for the protection of rare plants and animals in the United States. There are three key components of the ESA which must be maintained for the Act to remain effective: 1) Decisions must be based on sound and objective science; 2) economic considerations must be used judiciously, and should not be allowed to overshadow the scientific and biological foundation of the Act; and 3) habitat conservation must be an integral part of the Act, for species survival is inextricably linked to the existence of habitat. These principles must be incorporated into the reauthorized law, and form the backbone of the following recommendations:

- ◆ **Require independent scientific peer review of all proposals to list species and all draft plans to recover species.** The threatened or endangered determination should remain a biological judgement about the future viability of a species; economic considerations should not preclude the scientific determination of a species biological status.
- ◆ **Protect distinct populations and subspecies.** In the report *Science and the Endangered Species Act*, the National Research Council (NRC) finds that protecting subspecies is a scientifically sound and important provision of the ESA and should be maintained in the reauthorized act.
- ◆ **Include habitat degradation in the definition of "harm."** The loss of habitat is the leading cause of species endangerment. Habitat is directly linked to the welfare of a species, and therefore, habitat conservation is a prerequisite for endangered species recovery.
- ◆ **Delineate and conserve habitat that supports multiple species.** A primary goal of the ESA is to protect the ecosystems upon which endangered species depend. While the interpretation of the "purpose" language has varied, scientists generally acknowledge that ecosystem protection must play a key role in endangered species conservation. Ecosystem

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- conservation protects multiple species which depend on the same habitat.
- ◆ **Emphasize biologically effective and realistic goals in recovery plans.** Biologists generally agree that any species whose population is less than a few thousand individuals stands a significant risk of extinction over the course of the next several decades to several centuries. Many of the recovery plans that are approved set the population goals so low that, even if achieved, the species would remain at risk of extinction and could not be safely removed from the list. In many cases, recovery is limited by habitat loss; in these cases, low recovery numbers represent the best that can be done with the remaining habitat.
 - ◆ **Captive propagation should not be a stand alone solution to the endangered species problem, but rather an important component of the comprehensive habitat protection and recovery process.** Captive breeding can be an important component of species recovery. But the success of captive propagation as a method to strengthen populations depends on adequate habitat to support a self sustaining population in the wild. Captive propagation efforts must anticipate introduction, which cannot be successful without adequate habitat.
 - ◆ **Create "survival habitat" at the time of listing to prevent a species from going extinct before a recovery plan is implemented.** "Survival habitat" is the minimum amount necessary to support current populations or populations necessary to ensure short term (25-50 years) survival, as defined in *Science and the Endangered Species Act*. Because of its emergency nature, no economic considerations should preclude survival habitat designation. Survival habitat should be designated during the listing process, but should automatically expire with the adoption of a recovery plan and the designation of critical habitat.
 - ◆ **Streamline the listing process and avoid backlogs by designating critical habitat during the recovery planning process.** Many species are being listed too late in their declines to provide a reasonable chance of recovery. In this sense, the currently slow pace of listing and recovery plan implementation may be creating a pool of permanently endangered species. This change should be made in conjunction with designating "survival habitat" as recommended by the NRC at the time of listing to prevent the species from extinction before a recovery plan can be adopted.
 - ◆ **Create a wildlife diversity act, to be used in tandem with the ESA, to strengthen species protection before economic activities need be curtailed severely.** The Endangered Species Act is a safety net; it is an attempt to save species before extinction. While the ESA has proven to be effective in recovering some species, more work needs to be done to protect species before they become threatened or endangered. Wildlife diversity legislation which takes a comprehensive, landscape-wide approach to species conservation could prevent species from being listed.

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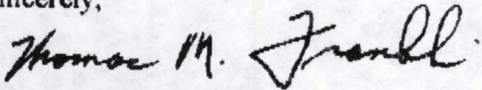
ESA Task Force Hearing

- ◆ **The Wildlife Society supports habitat conservation planning as a useful approach to accommodating desirable development projects while protecting species. The Wildlife Society is concerned, however, that the cumulative effects of these developments are not being taken into account when the HCPS are approved. The impacts must be assessed at a regional level, lest impacts accumulate and lead to unforeseen and unintended harm to the species. The size and distribution of habitat is critical—often patterns of habitat are as important as the amount of habitat protected. Wildlife corridors, for example, can be a powerful tool in species conservation, but the acreage and distribution must be planned carefully to deliver desired benefits.**
- ◆ **Develop voluntary incentive programs for protecting endangered species habitat.**

In summary, the ESA must: 1) subject listing decisions and draft recovery plans to independent scientific peer review; 2) uphold the biological emphasis of the Act by recognizing when biological and economic criteria are appropriate and; 3) recognize that both habitat conservation and species protection are critical to the effectiveness of the ESA. Additional legislation may be necessary to prevent species decline to threatened or endangered status.

Thank you for considering the views of wildlife professionals.

Sincerely,



Thomas M. Franklin
Wildlife Policy Director