

December 10, 2009

Secretary Ken Salazar
Department of the Interior
1849 C Street NW
Washington, DC 20240

Dear Secretary of Interior Ken Salazar,

As conservation scientists, we are writing to you to request that you rescind the 2007 Solicitor's memorandum (M-37013) reinterpreting the phrase "significant portion of its range" (SPOIR) in the definition of endangered species in the Endangered Species Act (ESA).

The memorandum sharply limits the scope of the ESA by limiting the analysis of whether species are endangered to current range and by specifying that when species are found to be endangered in a SPOIR, they will only be listed in the portion of range considered significant.

We are concerned that these interpretations will result in imperiled species not receiving protection and limit where species that are listed are ultimately recovered. We are also concerned that the memorandum will limit protection for endangered species to small portions of range where they may not be recoverable.

The ESA is our strongest law for protecting the species and ecosystems of the U.S. and thus it is of critical importance that it is implemented in a manner that provides protection to the many species that need them in all or significant portions of their range and to recover species and the ecosystems upon which they depend in as much of their historical range as possible. For all of these reasons, we ask that you rescind the Solicitor's memorandum on SPOIR.

Sincerely,

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