February 19, 2013

The Honorable Kenneth Salazar
Secretary U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

The Honorable Rebecca M. Blank
Acting Secretary
U.S. Department of Commerce
1401 Constitution Ave., N.W.
Washington, DC 20230

Dear Secretary Salazar and Acting Secretary Blank,

On behalf of our millions of our members, we request that you re-affirm this administration's commitment to our nation's most imperiled wildlife and plants as we move forward in the second term of the Obama Administration. We also ask that you take several specific actions to strengthen and improve the U.S. Fish and Wildlife Service's and the National Marine Fisheries Service's implementation and administration of the Endangered Species Act (ESA).

The ESA remains one of the strongest laws ever passed by any nation to protect species at risk of extinction. It has been tremendously successful at preventing extinction, protecting species and putting them on the path to recovery. Unfortunately, the conservation challenges today are far greater and more complex than they were 40 years ago, when the ESA was enacted. To ensure the continued success of this landmark law and preserve our nation's natural heritage, the Services must take prompt action to strengthen ESA implementation. Toward this end, we ask that you take the following actions:

Formally withdraw or substantially modify the draft policy interpreting the term "significant portion of its range" (SPR) within the ESA's definitions of threatened and endangered species:

The draft SPR policy's narrow focus on species viability fails to comport with the broad goals and purposes of the ESA. We have two fundamental problems with the draft SPR policy—specifically: (1) the proposed definition of "significant," which specifies that a portion of range can be considered significant only if loss of the species from that portion would threaten the species as a whole with extinction, and (2) the determination that lost historic range cannot qualify as a significant portion of range. As proposed, the draft policy will not provide meaningful protections to species that are threatened or endangered in portions of their range. We are particularly concerned that the draft policy has the potential to undermine the conservation of wide-ranging species such as the grizzly bear and gray wolf. As an alternative, we strongly support an approach that protects wide-ranging species throughout all significant portions of their current and historic range, an approach that would align with the ESA's central goal of preserving the ecosystems upon which threatened and endangered species depend.

Move forward with changes to the regulations for critical habitat by modifying those regulations to reflect that recovery of listed species is a central purpose of critical habitat under the ESA:

Habitat loss and habitat degradation continue to be the primary drivers of extinction within the United States and around the world. Research indicates that listed species with designated critical habitat generally have a better conservation status than those species without it. The reason for this is simple. Designating critical habitat provides significant conservation benefits to threatened and endangered species by prohibiting federal agencies from funding, permitting or carrying out actions that result in the "destruction or adverse modification" of critical habitat. This prohibition is not duplicative of the prohibition on activities that jeopardize the continued existence of listed species. Acknowledging that the adverse modification and the destruction of critical habitat harms species and impedes recovery would go a long way towards avoiding the death-by-a-thousand-cuts scenario that the ESA is designed to protect against. We hope that the Services will improve their consultation procedures as a result of these new regulatory proposals to better implement a recovery-focused, science-based approach to habitat protection.

Implement procedures to track the take of threatened and endangered species in a manner that is transparent to the public:

As far back as 1997, the Government Accountability Office documented that for the overwhelming majority of listed species, the Services do not know how many individuals they have permitted to be harmed or killed each year through issuance of incidental take permits. Baseline data on the amount of authorized take under all ESA programs, as well as data on the cumulative loss of critical habitat, are essential to any rationale and science-based conservation program, and we hope the Services move quickly to address this systemic deficiency. Equally important, a transparent process that allows the public to understand where and when threatened and endangered species are harmed is fundamental to good governance of the ESA.

Move forward on ways to better incentivize voluntary conservation activities under the ESA:

Many threatened and endangered species spend a portion of their life cycle on private lands. Helping incentivize landowner cooperation, while improving conservation outcomes on private lands, is essential to the recovery of many listed species. While it is important to create additional incentives for private conservation, the Services must also ensure that those who violate the ESA and harm protected species are held accountable for their actions. Without accountability, there will not be the appropriate balance of incentives and disincentives for private landowners to take proactive conservation actions on private lands.

In the last few years, we have seen repeated and unfounded attacks that have attempted to make the ESA, and other environmental laws, the scapegoat for our nation's current economic struggles. The reality is that a healthy environment provides the foundation for a strong and healthy economy. Our natural environment and our nation's wildlife support billions of dollars in annual economic activity. Strengthening our environment strengthens our economy, and we hope that you work with us to realize a healthier and less polluted environment that supports

vibrant wildlife populations. We hope President Obama's second term will result in a legacy as one of the great environmental presidents of the modern era. We believe that implementing these initial recommendations would represent a solid foundation to build upon that legacy, and we offer our full support in making them a reality.

Thank you for your consideration.

Respectfully,

Leda Huta
Executive Director
Endangered Species Coalition

William J. Snape, III
Senior Counsel
Center for Biological Diversity

David Yarnold
President and CEO
National Audubon Society

Phil Radford
Executive Director
Greenpeace USA

Debbie Sease
National Campaign Director
Sierra Club

Francesca Grifo
Senior Scientist and Senior Policy Fellow
Union of Concerned Scientist

Sylvia Fallon
Senior Scientist
Director, Wildlife Conservation Project
Natural Resources Defense Council

Jeffrey Flocken
North America Regional Director
International Fund for Animal Welfare (IFAW)

Marjorie Mulhall
Associate Legislative Counsel
Earthjustice

Corry Westbrook
Federal Policy Director
Oceana

Steve Holmer
Senior Policy Advisor
American Bird Conservancy &
Director, Bird Conservation Alliance

Scott Black
Executive Director
Xerces Society for Invertebrate Conservation

Marcie Keever
Oceans & Vessels Project Director
Friends of the Earth

Jeff Ruch
Executive Director
Public Employees for Environmental
Responsibility (PEER)

Sean Cosgrove
Director of Campaigns
Conservation Law Foundation

Duane Short
Wild Species Program Director
Biodiversity Conservation Alliance

Tehri Parker
Executive Director
Rocky Mountain Wild

Mark Salvo
Wildlife Program Director
WildEarth Guardians

Dave Werntz
Science and Conservation Director
Conservation Northwest

Philip Greenlee
Chairman/President
Federation of Fly Fishers

Nathan G. Johnson
Staff Attorney
Buckeye Forest Council

Buffalo Bruce
Staff Ecologist
Western Nebraska Resources Council

Nina Bell, JD
Executive Director
Northwest Environmental Advocates

Grant Campbell
Director of Wildlife Policy/Conservation Chair
South Florida Audubon Society

Dan Silver
Executive Director
Endangered Habitats League

Todd Steiner
Executive Director
Turtle Island Restoration Network

Jeff Miller
Director
Alameda Creek Alliance

Mary Ann Lucking
Director
CORALations

Rabbi Michael Lerner
Chair
The Network of Spiritual Progressives

Cara Campbell
Chair
Ecology Party

Tom Kelly
Executive Director
KyotoUSA

Victor Menotti
Executive Director
International Forum on Globalization

Rita Schenck
Executive Director
Institute for Environmental Research and Education

Clay G. Colson
Board Director and Water Issues Chair
Citizens for Sanity.Com, Inc.

Judi Poulson
Chair
Fairmont, MN Peace Group

Nancy B. Macy
Chair
Valley Women's Club's Environmental Committee for the SLV (Santa Cruz County)

Chris Matera, P.E.
Founder
Massachusetts Forest Watch

Marc Rice
Director, Sea Turtle Research Program
Director, Science and Technology
Hawaii Preparatory Academy

Dr. Arnold Newman
Director
The International Society for the Preservation of the Tropical Rainforest

Sarah B. Stewart
President
Animals Are Sentient Beings, Inc.

Lynn Adams
President
Pacifica Beach Coalition

Stephen Brittle
President
Don't Waste Arizona

Andrew J. Orahoske
Conservation Director
Environmental Protection Information Center

Dr. Lynette Hiilani Cruz
President
Ka Lei Maile Alii Hawaiian Civic Club

Roger Shamel
Founding Director
The Global Warming Education Network (GWEN)

John Weisheit
Conservation Director
Living Rivers

John Weisheit
Colorado Riverkeeper

Sarah Fields
Program Director
Uranium Watch

Ashley Anderson and Kate Finneran
Co-directors
Before It Starts (Stop Utah tar sands and oil shale)

Amy Trainer, JD
Executive Director
Environmental Action Committee of West Marin

Dave Murphy
Founder/Executive Director
Food Democracy Now!

Robert Witzeman, MD
Conservation Chairperson
Maricopa Audubon Society

Dan Brook, Ph.D.
Eco-Eating

Ed Friedman
Chair
Friends of Merrymeeting Bay

Ron Bottorff
Chairman
Friends of the Santa Clara River

Andy Arthur
Volunteer
Save the Pine Bush

Susan Nash
President
Friends of the Northern San Jacinto Valley

Marily Woodhouse
Director
Battle Creek Alliance

Myra Crawford, PhD, MPH
Executive Director
Cahaba Riverkeeper

Kerry Kriger, PhD
Executive Director
Save The Frogs!

Vickie Hennessy
President
Green Environmental Coalition

Norma J. F. Harrison
Member, Central Committees
Peace and Freedom Party

Carroll Muffett
President
Center for International Environmental Law

Alex Kearns
Co-Founder and Chair
St. Marys EarthKeepers, Inc.

Katey Lauer
Coordinator
The Alliance for Appalachia

Marnie Gaede
President
Fund for Wild Nature

Marcia Halligan
Kickapoo Peace Circle of Viroqua, WI

Robby Arrington
Riverkeeper
Altamaha Riverkeeper

Paul Gallimore
Director
Long Branch Environmental Education Center

David Kyler
Executive Director
Center for a Sustainable Coast

Dan Pingaro
CEO
Sailors for the Sea

Dana Beach
Executive Director
SC Coastal Conservation League

Barry Kohl, Ph.D
President
Louisiana Audubon Council

Dave Cooper
President
The Mountaintop Removal Road Show

Sloan Shoemaker
Executive Director
Wilderness Workshop

Jim Scheff
Director
Kentucky Heartwood

Daryl DeJoy
Executive Director
Wildlife Alliance of Maine

Mary Topa, Ph.D.
Executive Director
Georgia ForestWatch

Debbie Friedman
Co-Chair
MOMS Advocating Sustainability

Michael Kellett
Executive Director
RESTORE: The North Woods

Jane Winn
Executive Director
Berkshire Environmental Action Team

John Robison
Public Lands Director
Idaho Conservation League

David Wade
Director
Endangered Small Animal Conservation Fund

Darilyn Parry Brown
Executive Director
Hells Canyon Preservation Council

Michael Garrity
Executive Director
Alliance for the Wild
Rockies

Randall Garrett Herzon
Executive Director
Whisker Kisses Koalition

Anja Heister
Director, Wild and Free – Habitats Campaign
In Defense of Animals

Danna Smith
Executive Director
Dogwood Alliance

Dr. Kathryn Kennedy
Executive Director
The Center for Plant Conservation

Arlene Montgomery
Program Director
Friends of the Wild Swan

William W. Rossiter
President
Cetacean Society International

Kirk C Robinson, Ph.D.
Executive Director
Western Wildlife Conservancy

Marjorie Ziegler
Executive Director
Conservation Council for Hawai'i

Rochelle J Mason
Owner, Endangered Species Artist
R. Mason Fine Arts, RMFA Traveling Exhibits

Molly Tsongas
Director
Tatzoo

Keith Hammer
Chair
Swan View Coalition

Lupe Anguiano
Founder and Executive Director
Stewards of the Earth

Helen M. Parker
Conservation Chair
Champaign County Audubon Society

John Neville
President
Sustainable Arizona & Value the Verde
Ecotourism

Michael Stocker
Director
Ocean Conservation Research

Randall C. Haddock, PhD
Field Director
Cahaba River Society

Denise Boggs
Executive Director
Conservation Congress

Jeff Parker
Executive Director
Utah Environmental Congress

Donald B. Clark
Cumberland Countians for Peace & Justice
Network for Environmental & Economic
Responsibility
United Church of Christ

Jill Witkowski
Waterkeeper
San Diego Coastkeeper

John F. McFadden, PhD
Executive Director
TN Environmental Council

Alcides L. Morales-Pérez
Presidente
Puerto Rican Ornithological Society Inc.

Ann Vileisis
President
Kalmiopsis Audubon Society

Jim Ries
President
One More Generation

Lewis E. Patrie, M.D.
Chair
Western North Carolina Physicians for Social Responsibility

Joe Gutkoski
Montana River Action
Yellowstone Buffalo Foundation

Jon Anderholm
Director
Xun Biosphere Project

Leigh Adcock
Executive Director
Women, Food and Agriculture Network

Irene Bowie
Executive Director
Maui Tomorrow Foundation, Inc.

D. Bruce Means Ph.D.
President and Executive Director
Coastal Plains Institute and Land Conservancy

Leslie Perrigo
Executive Director
Independent Environmental Conservation and Activism Network (IECAN)

Jessica Hall
Executive Director and Baykeeper
Humboldt Baykeeper

Andrew Mason
Co-President
Delaware-Otsego Audubon Society, Inc. (NY)

Dr. Paul Nolan
President
Charleston (SC) Natural History Society

Cameron A. Young
Executive Director
Center for Snake Conservation

Lauren Ornelas
Founder/Executive Director
Food Empowerment Project

Jeff Holmes
Executive Director
The Amphibian and Reptile Conservancy

Lori Andresen
Director
Save Our Sky Blue Waters

David Godfrey
Executive Director
Sea Turtle Conservancy

Sophie Osborn
Wildlife Program Director,Wildlife Biologist
Wyoming Outdoor Council

Tracy Davids
Executive Director
Wild South

Rod Jude
Chairman
Montana Chapter of the Sierra Club

James D. Lazell
President
The Conservation Agency

Sean Stevens
Executive Director
Oregon Wild

Cynthia (Cyn) Sarthou
Executive Director
Gulf Restoration Network

Ernie Reed
Council Chair
Heartwood

Gary Macfarlane
Director
Friends of the Clearwater

Camilla H. Fox
Executive Director
Project Coyote

Melinda Hughes-Wert
President
Nature Abounds

Vivian Stockman
Project Coordinator
Ohio Valley Environmental Coalition

Rich Ray
Owner/operator
Hempen Goods

Mark Sprengel
Executive Director
Selkirk Conservation Alliance

Jennifer Nalbone
Director, Navigation and Invasive Species
Great Lakes United

Cory Hatch
Wildlands Director
Jackson Hole Conservation Alliance

Eddie Harris
President
Santa Barbara Urban Creeks Council

Marianne Edain
Brushfire Coordinator
Whidbey Environmental Action Network

Steve Hoffman
Executive Director
Montana Audubon

Michael R. Lunsford, J.D.
President
Gaviota Coast Conservancy

Allen Muller
Executive Director
Green Delaware

John E. Cornely, Ph.D.
Executive Director
The Trumpeter Swan Society

Harry Vogel
Senior Biologist/Executive Director
Loon Preservation Committee

Lynn Carroll, Ph.D.
Senior Scientist
TEDX, The Endocrine Disruption Exchange

Linda Stone
Director, New Orleans Office
Global Green USA

Kevin Emmerich
Co-Founder
Basin and Range Watch

Edmond Urbanski
Operations Manager
Prairie Dog Pals

Kelly Mooij, Esq.
V.P. of Government Relations
New Jersey Audubon

Sharnelle A. Fee
Director
Wildlife Center of the North Coast

Lane Brody
Chairman and In-Kind CEO
Walden's Puddle Wildlife Rehabilitation and Education Center

Karen Etter Hale
Executive Secretary
Madison Audubon Society (WI)

L. Wesley Earp
President
Howard County Bird Club, Maryland Ornithological Society

Mike Bartlett
President
New Hampshire Audubon

Jean Watt, President
President
Friends of Harbors, Beaches and Parks (Orange County, CA)

Dianne James
President
Midwest Prairie Dog Shelter, Inc.

Hilary Cooper
Director
Sheep Mountain Alliance

Monica Bond
Principal Scientist
Wild Nature Institute
Randy Hayes
Executive Director
Foundation Earth

Chris Weiss
Executive Director
DC Environmental Network

Stan Kotala, M.D.
Conservation Chair
Juniata Valley Audubon

Jon Way
Barnstable, MA
Eastern Coyote/Coywolf Research

Susan Harvey
President
North County Watch

Jack Eidt
Director
Wild Heritage Planners

Laura Leigh
President and Founder
Wild Horse Education

Frank Chitwood
Executive Director
Coosa Riverkeeper

Maggie Howell
Executive Director
Wolf Conservation Center

Gary Tabor
Director
Center for Large Landscape Conservation

Richard Popchak
Communications and Development Director
Ventana Wilderness Alliance

Dave Hornoff
Executive Director
National Wolfwatcher Coalition

Christopher Spatz
President
Cougar Rewilding Foundation

Thomas Jervis, Ph.D.
President
Sangre de Cristo Audubon Society

Diana Van Buren
President
North Fork Audubon Society

Terry Weiner
Conservation and Projects Coordinator
Desert Protective Council

Daniel Brister
Director
Buffalo Field Campaign

Maureen Hackett, MD
Founder and President
Howling For Wolves

John Meyer
Executive Director
Cottonwood Environmental Law Center

Mary Ann Hannon
Coordinator
Friends of Springtown Preserve

Ruth Brooks
President and Founder
Freedom Center for Wildlife, Inc.

David M. Petrie
Executive Director
Coos Waterkeeper

Ralph Rosenberg
Executive Director
Iowa Environmental Council

Bill Matturro
Founder
Protect All Living Species (PALS)

Peter G. Saenger
Ornithologist
Muhlenberg College

Raelene Gold
Past President, Current WA State Vice President
Federation of Western Outdoor Clubs

Margaret Henke
Co-Chair
The Orange County Interfaith Coalition for the Environment

Jennifer Rycenga
President
Sequoia Audubon Society

Roxanne Kremer
Executive Director & Founder
International Society for the Preservation of Tropical Rainforest

Jane R. Gulley
President
Audubon Society of Central Arkansas

Brent Plater
Executive Director
Wild Equity Institute

Michael Beck
President
Endangered Habitats Conservancy

Travis Longcore, Ph.D.
Science Director
The Urban Wildlands Group

Edward E. Clark, Jr.
President
Wildlife Center of Virginia

Philip M. Klasky
Steering Committee
Community ORV Watch

Allen Stasiewski
Vice President
Waukesha County Environmental Action League

Monte Thompson
Executive Director
Species Alliance

Skip Lazell
Director
The Conservation Agency

Mylea Bayless
Director of Conservation Programs
Bat Conservation International

Kirk Robinson, Ph.D.
Executive Director
Western Wildlife Conservancy

William M. Hering
President
Rogue Valley Audubon Society

Christine Ellis
Waccamaw Riverkeeper
Winyah Rivers Foundation

Susan Schwartz
President
Friends of Five Creeks

Darlene M. Kobobel
President/Colorado Wolf and Wildlife Center
Species Survival Protection participant
Association of Zoos and Aquariums

Helen E. Drummond
Executive Director
Houston Audubon

Tim Keating
Executive Director
Rainforest Relief

Eugenia Marks
Senior Director of Policy
Audubon Society of Rhode Island

Noel Rowe
President
Primate Conservation Inc.

Anne Palyok
Director of Rehabilitation
Carolina Wildlife Care

Leonard Pardue
President, Board of Directors
Elisha Mitchell Audubon Society

cc: The Honorable Dan Ashe
Director
U.S. Fish and Wildlife Service
1849 C Street N.W.
Washington, D.C. 20240

The Honorable Jane Lubchenco
Administrator
National Oceanic and Atmospheric Administration
1401 Constitution Avenue N.W.
Washington, D.C. 20230