

January 25, 2018

**Re: Oppose Efforts to Gut Safeguards Protecting Imperiled Species from Pesticides**

Dear Senator/Representative:

The undersigned 258 conservation, consumer, agricultural, and other public interest groups urge you to oppose all efforts to weaken or gut Endangered Species Act requirements to address the effects of toxic pesticides on threatened and endangered species. The Endangered Species Act is our nation's most effective law for protecting wildlife in danger of extinction and has prevented the extinction of more than 99 percent of the species under its care. This vital law is supported by more than 90 percent of American voters.

Some members of the pesticide manufacturing industry are proposing legislation that would exempt their products from key Endangered Species Act safeguards. Their proposal would also exempt this industry from responsibility for the harms caused by pesticides to West Coast salmon, California condors, Florida panthers and a host of other imperiled species. These proposed changes would severely undermine the Endangered Species Act and have devastating consequences for our nation's threatened and endangered species.

Under current law, the Environmental Protection Agency (EPA) must consult with two expert agencies—the U.S. Fish and Wildlife Service and National Marine Fisheries Service (“the wildlife agencies”)—to identify and minimize impacts to endangered species caused by pesticide products that EPA registers for commercial use. When necessary, these science-based interagency consultations result in commonsense protections, such as limits on spraying pesticides in key areas where endangered species live.

The industry-proposed legislation would gut these longstanding requirements and instead put large corporate interests in control. In addition, this dangerous legislation would exempt all approved pesticide use from enforcement under the Endangered Species Act, even where it directly kills or injures endangered wildlife.

Our organizations are supportive of administrative innovations to improve interagency consultations on the impacts of pesticides on endangered species. The National Academy of Sciences made recommendations to do just that in a 2013 report. This process is already underway with a set of pilot consultations on three neurotoxic pesticides—chlorpyrifos, malathion and diazinon—and we support its continued implementation and refinement.

Unfortunately, in April of 2017, Dow AgroSciences asked EPA Administrator Scott Pruitt to stop all of his agency's work to assess the effects of these three pesticides on endangered species. This request came shortly after Mr. Pruitt defied his own agency's previous finding that chlorpyrifos is unsafe, especially to young children, by allowing it to remain on the market. We urge you to ensure that this interagency consultation process continues in earnest and that EPA and the wildlife agencies involved receive adequate funding.

Endangered species are often the early warning system to alert us to the unintended harms of pesticides. It was the catastrophic decline of the bald eagle, peregrine falcon and other endangered species that caused the U.S. Fish and Wildlife Service and other agencies to sound the alarm on DDT. Thankfully, the bald eagle, our national symbol, was saved from extinction by the protections afforded by the Endangered Species Act. The Act remains the “gold standard” for species protection and recovery today, both here and around the world. We ask you to protect this vital law, not only to save our most treasured rare plants and animals, but also to protect our waters, our lands, and our health. Please oppose all efforts to weaken the Act’s ability to protect our environment from toxic pesticides.

Sincerely,

## **NATIONAL ORGANIZATIONS**

Advocates for Snake Preservation  
All-Creatures.org  
American Bird Conservancy  
American Birding Association  
American Indian Mothers Inc.  
Animal Legal Defense Fund  
Animal Welfare Institute  
Animals Are Sentient Beings, Inc.  
Avaaz  
Avian Research and Conservation Institute  
Basin and Range Watch  
Beyond Pesticides  
Bold Visions Conservation  
Born Free USA  
Boulder County Audubon Society  
Center for Biological Diversity  
Center for Food Safety  
Center for Environmental Health  
Citizens for Sludge-free Land  
Clean Water Action  
Coalition on the Environment and Jewish Life  
Conservation Imaging, Inc.  
Cornell Lab of Ornithology  
Defenders of Wildlife  
Desert Tortoise Council  
Earthjustice  
Ecosistemas Andinos  
Endangered Small Animal Conservation Fund  
Endangered Species Coalition  
Food & Water Watch  
For the Fishes  
Friends of the Earth US  
Fund for Wild Nature

Garden, Inc.  
Great Old Broads for Wilderness  
GreenFaith  
GreenLatinos  
Greenpeace  
Hawk Mountain Sanctuary Association  
Hilton Pond Center for Piedmont Natural History  
Honor the Earth  
Humane Society Legislative Fund  
In Defense of Animals  
International Bird Rescue  
International Fund for Animal Welfare  
International Marine Mammal Project of Earth Island Institute  
Justice for Wolves  
Moms Advocating Sustainability.org  
Native American Community Board  
Native Plant Conservation Campaign  
Natural Resources Defense Council  
Oceana  
One More Generation  
OneLessStraw  
Peace and Freedom Party  
Pesticide Free Zone  
Power Shift Network  
Predator Defense  
Project Coyote  
Public Employees for Environmental Responsibility  
Public Lands Project of Rochester Area Vegan Society  
Sailors for the Sea  
Save Animals Facing Extinction  
Save EPA  
SAVE THE FROGS!  
Saving Birds Thru Habitat  
Sequoia ForestKeeper  
Sierra Club  
Slow Food USA  
Spirit of the Sage Council  
SustainUS  
Tellus Institute  
The Carl Safina Center  
The Cougar Fund  
The Humane Society of the United States  
The Institute for Bird Populations  
The Rewilding Institute  
Tikkun's Network of Spiritual Progressives  
Turtle Island Restoration Network  
Urban Bird Foundation  
Voces

Walden Woods Project  
Waterkeeper Alliance  
Western Watersheds Project  
WildEarth Guardians  
Wild Horse Education  
Wilderness Watch  
WilderUtopia  
Wildlands Network  
Wildlife Rescue & Rehabilitation Inc.

## **REGIONAL ORGANIZATIONS**

### **Alabama**

Alabama Environmental Council  
Black Warrior Riverkeeper  
Cahaba River Society

### **Alaska**

Alaska's Big Village

### **Arizona**

Grand Canyon Trust  
Maricopa Audubon Society  
Sustainable Arizona  
Tucson Audubon Society

### **California**

Alameda Creek Alliance  
Antelope Valley Conservancy  
Battle Creek Alliance, Defiance Canyon Raptor Rescue  
California Chaparral Institute  
Californians for Alternatives to Toxics  
Californians for Pesticide Reform  
Californians for Western Wilderness  
Citizens Committee to Complete the Refuge  
Endangered Habitats League  
Environmental Action Committee of West Marin (EAC)  
Environmental Protection Information Center  
Friends of Harbors, Beaches and Parks  
Friends of the Santa Clara River  
Golden Gate Audubon Society  
Klamath Forest Alliance  
KyotoUSA  
Moms Advocating Sustainability  
Native Songbird Care & Conservation

North County Watch  
Occidental Arts and Ecology Center  
Pacifica Beach Coalition  
Poison Free Malibu  
Pomona Valley Audubon Society  
Raptors Are The Solution  
Redwood Region Audubon Society  
San Bernardino Valley Audubon Society  
San Francisco Baykeeper  
San Joaquin Raptor/Wildlife Rescue Center  
San Joaquin Valley Conservancy  
Santa Clara Valley Audubon Society  
The Urban Wildlands Group  
Tuolumne River Trust  
Ventana Wilderness Alliance  
Watershed Alliance of Marin  
Wild Nature Institute  
WILDCOAST

### **Colorado**

Animas Valley Institute  
Blue Sky Rehabilitation  
Boulder Rights of Nature, Inc.  
Colorado State Beekeepers Association  
Living Rivers & Colorado Riverkeeper  
People and Pollinators Action Network  
Rocky Mountain Recreation Initiative  
Rocky Mountain Wild  
San Juan Citizens Alliance  
Wilderness Workshop

### **Delaware**

Delaware Ecumenical Council on Children and Families  
Green Delaware

### **District of Columbia**

DC Environmental Network  
Potomac Riverkeeper Network

### **Florida**

Miami Waterkeeper  
South Florida Wildlands Association  
St. Johns Riverkeeper

**Georgia**

Georgia ForestWatch

**Hawaii**

Apollo Kauai

Conservation Council for Hawai'i

Maui Forest Bird Recovery Project

**Idaho**

Kootenai Environmental Alliance

Selkirk Conservation Alliance

WildLands Defense

**Illinois**

Bird Conservation Network

Chicago Audubon Society

Seven Generations Ahead

**Indiana**

Hoosier Environmental Council

Independent Environmental Conservation & Activism Network

South Bend-Elkhart Audubon Society

**Iowa**

Iowa Audubon

**Kentucky**

Kentucky Heartwood

**Louisiana**

Gulf Restoration Network

Orleans Audubon Society

**Maine**

Friends of Merrymeeting Bay

**Maryland**

Audubon Naturalist Society

Climate Stewards of Greater Annapolis

CSGA

Gunpowder RIVERKEEPER

Maryland Ornithological Society

Maryland Pesticide Education Network

Potomac Riverkeeper

Wicomico Environmental Trust

**Massachusetts**

Berkshire Environmental Action Team  
Eastern Coyote/Coywolf Research  
Mass Audubon  
RESTORE: The North Woods

**Michigan**

Charter Sanctuary  
Chocolay Raptor Center

**Minnesota**

Fairmont, MN Peace Group  
Howling For Wolves  
Mankato Area Environmentalists  
Minnesota River Valley Audubon Chapter  
Occupy Duluth  
Pollinate Minnesota  
Save Our Sky Blue Waters

**Montana**

Alliance for the Wild Rockies  
Cottonwood Environmental Law Center  
Friends of the Bitterroot  
Friends of the Wild Swan  
Speak Up For Wildlife Foundation  
Swan View Coalition

**Nebraska**

Western Nebraska Resources Council

**New Hampshire**

Audubon Society of New Hampshire

**New Jersey**

Animal Protection League of New Jersey  
Monmouth County Audubon Society

**New Mexico**

ON A WING AND A PRAYER  
Southwest Environmental Center  
Southwestern New Mexico Audubon Society  
Upper Gila Watershed Alliance

**New York**

Citizens Campaign for the Environment

NYC Audubon

Save the Pine Bush

Wild Birds Unlimited of Syosset

**North Carolina**

Cape Fear River Watch

Dogwood Alliance

MountainTrue

NC WARN

The Canary Coalition

The Forest Foundation, Inc

Toxic Free North Carolina

**Oregon**

Beyond Toxics

Geos Institute

Greater Hells Canyon Council

Kalmiopsis Audubon Society

Klamath Riverkeeper

Klamath Siskiyou Wildlands Center

KS Wild

Northeast Oregon Ecosystems

Northwest Center for Alternatives to Pesticides

Northwest Environmental Advocates

Northwest Environmental Defense Center

Oregon Natural Desert Association

Salem Audubon Society

Wild and Scenic Rivers

**Pennsylvania**

Delaware Valley Ornithological Club

Juniata Valley Audubon Society

Pennsylvania Native Plant Society

Save Our Allegheny Ridges

**South Carolina**

Upstate Forever

**Tennessee**

Cumberland-Harpeth Audubon Society

Tennessee Clean Water Network



Tennessee Environmental Council  
Tennessee Ornithological Society  
Tennessee Riverkeeper

### **Texas**

Texas River Revival

### **Utah**

Uranium Watch  
Wasatch Clean Air Coalition  
Western Wildlife Conservancy  
Yellowstone to Uintas Connection

### **Vermont**

Vermont Center for Ecostudies

### **Virginia**

Audubon Society of Northern Virginia  
Friends of Dyke Marsh  
Shenandoah Riverkeeper

### **Washington**

Conservation Northwest  
Friends of Bumping Lake  
Kettle Range Conservation Group  
Wolf Haven International

### **West Virginia**

Upper Potomac Riverkeeper

### **Wisconsin**

Madison Audubon  
Raptor Services, LLC  
Viroqua Biodynamic Group & Kickapoo Peace Circle  
Western Great Lakes Bird and Bat Observatory, Inc.

### **Puerto Rico**

Citizens of the Karst