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Re: Public Input on Proposed Rule Issues by the Fish and Wildlife Service (FWS) on
Endangered and Threatened Species: Interagency Cooperation

To Whom It May Concern,

I am writing to you today on behalf of the nearly 7,000 members of the Entomological Society of America (the Society) regarding the "Revision of Regulations for Interagency Cooperation" (Docket Number FWS-HQ-ES-2018-0009-0001).

The Society recognizes that successful conservation can be burdensome and expensive. Often the state and federal agencies that lead these initiatives are understaffed and underfunded. In particular, pushing more responsibility onto state-run agencies and organizations with their often limited financial resources increases the probability that these programs will become overwhelmed and overburdened, with detrimental results for threatened and endangered species. It is for this reason that we support increased collaboration, especially at the federal level, between all the agencies involved in species and habitat conservation.

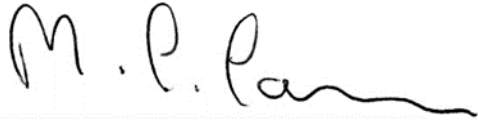
The Society specifically encourages greater collaboration with the Environmental Protection Agency (EPA), particularly as it relates to pesticide risk assessment expertise, data collection, and coordination to reduce redundancy. Improper pesticide usage or a failure to conduct the necessary risk assessments can have long-lasting, negative effects on physical health and population density of insects, plants and vertebrates. As the agency responsible for the regulation and approval of pesticides and other insecticides, EPA should be playing a much larger role in coordinating federal conservation efforts.

As more agencies get involved in the implementation of the Endangered Species Act the potential for duplicative efforts increases. Given the limited resources available for federal conservation programs, the Society supports the Administration's efforts to streamline conservation activities and eliminate any redundancies. However, streamlining should not come at the detriment of the species the law is intended to protect. Transparent communication and coordination between participating agencies would allow for the identification and elimination of redundant initiatives and encourage a more structured, holistic approach to conservation. Animals, including insects, seldom heed state borders, so effective management of these species requires collaboration at all levels of government. Coordination among agencies across the federal government ensures that the financial burden would not be shouldered by one single agency. Distributing the fiscal responsibility helps allow for efficient and effective implementation of the law.

We recognize that the Endangered Species Act is not perfect as written, and changes could be made to streamline implementation and maximize investments in species conservation. To this end, FWS should work with the scientific community as well as federal, state, and local conservation agencies to ensure that improvements are made to the benefit of the species in a streamlined, cost-effective, scientifically sound manner.

We thank you for the opportunity to provide comments on this issue. The Entomological Society of America and its many subject-matter experts remain a resource for the Agency, should you need input on any topic of entomological importance.

Sincerely,

A handwritten signature in black ink that reads "M. P. Parrella". The signature is written in a cursive style with a long, horizontal flourish at the end.

Michael Parrella, Ph.D.
President, Entomological Society of America