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The Honorable John Barrasso
307 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Tom Carper
513 Hart Senate Office Building
Washington, DC 20510

July 30, 2018

Dear Chairman Barrasso and Ranking Member Carper,

On behalf of the nearly 7,000 members of the Entomological Society of America (ESA), I write to express our concern about the proposed changes to the Endangered Species Act of 1973. The Endangered Species Act is one of America's key conservation laws. Designed to protect rare as well as vulnerable species, it was approved by Congress without controversy and remains a popular piece of bipartisan legislation.

Federal and state agencies spend some \$1.5 billion per year to implement the Endangered Species Act, but the return on investment (ROI) for protecting the biodiversity of insects alone is far greater. For example, native insects such as the rusty patched bumble bee contribute to more than \$3 billion in pollination services to U.S. crops. Ecosystem services have an ROI of \$57 billion and include providing food for game fish, ducks, bears, and other wildlife; reducing costs of pest control; and improving ecosystem health by recycling nutrients. Endangered species protection and recovery efforts are widely recognized as a worthwhile economic investment. Because ecosystems embody complex relationships among the plants, animals, and microbes that inhabit them, the decline and eventual loss of a species can have unpredictable consequences.

In addition to being cost-effective and ecologically sound, we have plenty of evidence that the Endangered Species Act works. While the existing bill has a 99 percent success rate in rescuing species from extinction, there is room for improvement. ESA is appreciative of the efforts being made by the Committee to strengthen protections for endangered species but is opposed to the provisions in the Discussion Draft that could do more harm than good and undermine current and future conservation efforts. Specifically, remanding control to the States is of great concern, especially with lack of funding to accompany this responsibility. The proposed changes are setting the Act up for failure, and the species it is supposed to protect will pay the ultimate price: extinction.

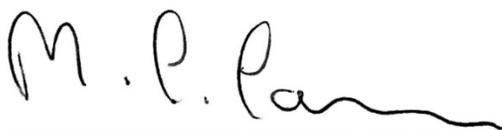
States play a critical role in implementing provisions of the Endangered Species Act and deserve a seat at the table when conservation decisions regarding native species are being made. However, insects, plants, and vertebrates do not adhere to state or even international borders. Migratory birds, wildlife, and insects—such as the Monarch butterfly—cross human boundaries as part of their natural processes. The historical and current native range of many endangered species extends beyond a single state, and recovery plans must continue to maintain that perspective. ESA recognizes that recovery plans must continue to take into account multiple stakeholders, including landowners, developers, the agriculture community, and the general public, with sound science as an integral part of the process. Leaving conservation efforts up to the states, even with interstate and local representation on committees, would create jurisdictional issues and could lead to inconsistent policies for managing habitats of a single species or ineffective conservation efforts. It is for this reason that federal agencies should maintain oversight and implementation authority, to ensure uniform implementation of the Endangered Species Act and consider the needs of all the stakeholder groups involved.

Furthermore, adding unfunded federal mandates to the burden of state activities at a time when many are struggling to balance their budgets is not a prudent way to successfully execute a policy of protection and restoration. One of the most significant challenges faced by local, state, and federal conservation agencies is insufficient resources. We encourage the committee to work together to strengthen the appropriations for this Act. Thus, we strongly oppose efforts to offset federal protection and funding because this is crucially a federal issue that cannot be responsibly passed off to states while still expecting to see a coordinated effort to recover endangered and threatened species.

Insects are essential components of the biological diversity that sustain healthy ecosystems. Though critical to the planet's health and sustainability, insects and other arthropods are often overlooked in matters related to the Endangered Species Act, as stated in our position paper on the topic (<http://www.entsoc.org/sites/default/files/files/Science-Policy/ESA-PolicyStatement-Endangered-Species.pdf>). We urge you to consider this important group of animals that would be negatively impacted by the changes proposed in the Discussion Draft.

ESA stands ready to offer the advice and experience of thousands of entomologists that constitute our members from academia, government, and industry to help the Committee in its efforts to protect and recover endangered and threatened species for the good of the nation.

Sincerely,

A handwritten signature in black ink, appearing to read "M. P. Parrella". The signature is fluid and cursive, with a long, sweeping underline.

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