



September 24, 2018

Re: Proposed Changes to Endangered Species Act Rules

The Seatuck Environmental Association is a member-supported, non-profit organization that works to advance the conservation of wildlife on Long Island, New York. Since incorporating in 1989 Seatuck has worked--through advocacy, education and research--to protect and conserve Long Island wildlife and the natural habitats on which they depend. On behalf of our thousands of members and supporters, we write to express our opposition to the proposed rule changes under the Endangered Species Act (ESA).

The benefits of the Endangered Species Act have been prominent in the minds of Long Islanders in recent years as the heralded recovery of the American Bald Eagle, underway since the 1970s, has recently reached our shores. People across the region have been surprised and heartened over the past decade as eagles have extended their range to Long Island. With now nearly a dozen nesting pairs across the island, people of all ages are celebrating the return of the stately raptors. And they are grateful for the ESA's protections that have safeguarded the bird's population and allowed for such a robust recovery since the banning of DDT.

Even more recently, Long Island has been abuzz with increasingly common sightings of Humpback Whales. These majestic marine mammals have captivated the attention of people across the region as they have become regular visitors to our nearshore waters. The recovery of Humpbacks--made possible by the ESA--has not only inspired everyone from grade school students to nature photographers, but also been a boon to tour boat operators and the local tourist economy.

These are two ESA success stories that have directly impacted Long Island, but there are many more. We commend the Services for these results and urge them to build upon this legacy of success and to refrain from undermining a program that has achieved significant results for wildlife conservation and has earned the respect and gratitude of the American people. We suggest, as the old adage goes, "if it ain't broke, don't fix it!"

In addition, we highlight three specific concerns. First, we are gravely concerned about the effort to restrict consideration of the "foreseeable future" when making listing decisions. While it might make sense for the Services to avoid "speculating as to what is

hypothetically possible,” it is absurd to ignore what science tells us is very likely, especially with regard to the impacts of climate change and sea level rise. Long Islanders, like all Americans living on the coast, know all too well that sea level rise isn’t some distant, hypothetical threat; rather, it is something that is already impacting people’s lives, as well as the wildlife and natural habitats upon which our coastal communities depend. Consideration of these impacts is not useless speculation, but exactly the kind of long term thinking and planning that has made the ESA a success and that is even more critical in an era of rising seas.

Second, we are troubled by the potential removal of protections for species listed as threatened under the ESA. These species are in dire straits, and in most cases the factors leading to their decline are worsening, not improving. Further delay in implementing the ESA’s full protections may put them past the point of no return, making last-minute efforts to save their populations futile and hopeless.

Finally, we oppose the proposal to mandate the consideration of economic factors in making listing decisions under the ESA. Determinations about the needs of wildlife should be based on biological criteria and sound science, period. Allowing economic factors to be a part of the process will allow for pressure to protect corporate interests. We urge the Services to make decisions based only on biological criteria and stick to the adage that, in the long run, good environmental policy makes good economic policy. While efforts to safeguard wildlife and ecosystem health may occasionally have impacts on narrow, short-term economic interests, our national interests are better served over the long term when ecosystems are healthy and wildlife populations robust.

We appreciate this opportunity to comment on the proposed changes. We urge the Services to reverse course on these ill-considered proposals and to instead protect the Endangered Species Act.

Sincerely,

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Seatuck Environmental Association

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