

April 6, 2022

Martha Williams
Director
U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

Re: Reforming the U.S. Fish and Wildlife Service's Listing Program

Dear Director Williams,

On behalf of our organizations and our millions of members and supporters, we urge you to take immediate action to reform the U.S. Fish and Wildlife Service's listing program to ensure that our nation's most imperiled species get the timely protections they so desperately need to avoid extinction and start their journey towards recovery.

The Endangered Species Act has been incredibly successful at saving animals and plants from extinction, but the Act's strong protections are only provided to species if, and only if, they are formally listed as threatened or endangered under the law. In many cases, this often means that the decision to list an animal or plant is literally a matter of life or death. Yet for too long, the Service has been reticent to list species and fully implement the law in the face of improper political interference and opposition from powerful special interests. As a result, the agency has failed to protect species for years, even decades—making extinction much more likely and recovery much more difficult and expensive.

Currently, more than 400 animals and plants are still awaiting protection decisions and hundreds more imperiled species are not even under consideration. On average, the agency has taken 12 years to protect species even though under the Act it should take no more than two. These delays have had devastating consequences. The Service recently removed 22 animals and one plant from the endangered species list due to extinction—the largest set of delistings in the agency's history and a stark reminder that the Service is not doing enough to stem the loss of our nation's biodiversity and halt the global extinction crisis. Many of these 23 species went extinct during a delay in the listing process, including the Guam bridled white-eye and the flat pigtoe, southern acornshell, stirrupshell, and upland combshell mussels. In total, nearly 50 unlisted species have gone extinct waiting for protection. This is an unforgiveable moral failure.

The Service badly needs to reform its process for protecting species, otherwise we're at risk of losing hundreds of more irreplaceable animals and plants to extinction. If trends hold, one species will be declared extinct every year in the United States while waiting for protection under the Act. While lack of funding for the listing program has contributed to delays in protection, funding shortfalls from Congress represent only part of the problem. The Service has suffered from years of overt political and industry pressure designed to weaken the Act, and as a result, the Service's implementation of the Act is no longer primarily driven by the best available science. In particular, the agency's process for listing decisions involves multiple layers of bureaucracy and upwards of 20 people who only vet listing decisions based on political

concerns. While expert biologists draft listing proposals, these proposals can be overturned at any point during this cumbersome review process by regional directors, the head of the listing division, the Assistant Director for Ecological Services, or high-level political appointees who often have no relevant, specific scientific background. In fact, it is frequently the case—especially with politically controversial species—that listing decisions are made in Washington, DC, including reversing the original listing recommendations of the Services’ own scientists.

Sadly, the majority of extinctions are entirely preventable, so when we lose a species to extinction it is really a political choice. The Service is empowered to implement the strong provisions of the Endangered Species Act, and if it did so boldly and in accordance with the best available science, there is no question that the agency could protect and recover species more quickly. It just needs to muster the political will to do so.

There is no longer any time to waste. We have already lost hundreds of species to extinction in the United States, and now one million animal and plant species here and around the world face extinction in the coming decades if urgent action isn’t taken. If the Service truly wants to reverse species extinctions, stem the loss of global biodiversity, and restore the United States as a leader in conservation, it must take transformative action to reform the listing process, restore its moral compass and revitalize its commitment to its core wildlife conservation mission.

Sincerely,

Center for Biological Diversity
7th Generation Advisors
Acopian Center for Ornithology
Advocates for Snake Preservation
Alameda Creek Alliance
Alaska's Big Village Network
Alpine Lakes Protection Society
American Indian Mothers Inc.
Animal Legal Defense Fund
Animal Protection League of New Jersey
Animals Are Sentient Beings Inc
Animas Valley Institute
Audubon Society of Central Arkansas
Battle Creek Alliance
Berkshire Environmental Action Team (BEAT)
Bird Conservation Network
Black Warrior Riverkeeper
Boulder Rights of Nature, Inc.
Buffalo Field Campaign
Cahaba River Society
California Wildlife Foundation
Californians for Alternatives to Toxics
Californians for Western Wilderness
Center for Food Safety

Christian Council of Delmarva
Christmas Caring for Creation
Citizens Committee to Complete the Refuge
Coast Range Association
Conservation Congress
Conservation Northwest
CORALations, Inc.
Deer Creek Valley Natural Resources Conservation Association
Defiance Canyon Raptor Rescue
Desert Tortoise Council
Dogwood Alliance
Earth Path Sanctuary
Eastern Coyote/Coywolf Research
Eco-Eating
Endangered Habitats League
Endangered Small Animal Conservation Fund
Endangered Species Coalition
Environmental Protection Information Center- EPIC
Evergreen Audubon
Forest Keeper
Foundation Earth
Friends of Big Ivy
Friends of Blackwater
Friends of Merrymeeting Bay
Friends of the Bitterroot
Friends of the Eel River
Gallinas Watershed Council
Glynn Environmental Coalition
Great Lakes Wildlife Alliance
Greater Hells Canyon Council
Healthy Gulf
Heartwood
High Country Conservation Advocates
Hilton Pond Center for Piedmont Natural History
Humane Action Pittsburgh
I Heart Pisgah
In Defense of Animals
In the Shadow of the Wolf
Indiana Forest Alliance
inNative
International Marine Mammal Project of Earth Island Institute
Jemez Peacemakers
Justice for Wolves
Kentucky Heartwood
Kettle Range Conservation Group
Kickapoo Peace Circle

Klamath Forest Alliance
Kodiak Audubon
League of Humane Voters of New Jersey
LEGACY-The Landscape Connection
Maryland Ornithological Society
Massachusetts Forest Watch
Miami Waterkeeper
Minnesota River Valley Audubon Chapter
Monterey Audubon Society
National Wolfwatcher Coalition
Nevada Wildlife Alliance
New Mexico Wild
Northeast Oregon Ecosystems
Northwest Environmental Advocates
NY4WHALES
Oasis Earth
Oceanic Preservation Society
Oregon Wild
Organic Consumers Association
Palm Beach County Environmental Coalition
Peace 4 Animals
Potomac Valley Audubon Society, Inc.
Preserving Grayson
Preserving Grayson, Inc.
Public Lands Project
Raptors Are The Solution
Resource Renewal Institute
RESTORE: The North Woods
Rock Creek Alliance
Rocky Mountain Wild
San Bernardino Valley Audubon Society
San Diego Coastkeeper
Save Our Cabinets
Save Our Sky Blue Waters
Save The Colorado
SAVE THE FROGS!
Save the Manatee Club
Save the Pine Bush
Sciencecorps
Selkirk Conservation Alliance
Sequoia ForestKeeper®
Shoals Environmental Alliance
SoCal 350 Climate Action
Social Compassion in Legislation
Standing Trees
The Alliance for Appalachia

The Rewilding Institute
The Walden Woods Project
Toxic Free North Carolina
Turtle Island Restoration Network
Upper Peninsula Environmental Coalition
Utah Native Plant Society
Valley Women's Club Environmental Committee
Ventana Wilderness Alliance
Virginia Organizing
Wasatch Clean Air Coalition
Watershed Alliance of Marin
Western Environmental Law Center
Western Wildlife Outreach
Wild Fish Conservancy
Wild Horse Education
Wild Nature Institute
WILDCOAST
WildEarth Guardians
Wishtoyo Foundation
Wolves of the Rockies
WUU Green Sanctuary Committee
Wyoming Untrapped
Wyoming Wildlife Advocates
Zero Waste California