



July 5, 2018

The Honorable John Barrasso, M.D.
Chairman
United States Senate Committee on Environment
and Public Works
410 Dirksen Senate Office Building
Washington, DC 20510

Dear Chairman Barrasso:

On behalf of the National Association of Counties (NACo), the only organization representing the nation's 3,069 counties, parishes and boroughs, thank you for your efforts to modernize the Endangered Species Act (ESA) through drafting the Endangered Species Act Amendments of 2018. Counties appreciate your leadership to ensure that species conservation policy is based on the best-available scientific data with the maximum level of involvement from state and local governments. We believe that the draft legislation offers significant improvements to the ESA and hope to see Congress act on this important issue soon.

Counties strongly support provisions of the draft legislation to ensure greater and more proactive consultation with state and local governments in the development of recovery goals for threatened and endangered species. State and local governments serve as important partners with the federal government in resource and wildlife management decisions, including on federal lands. Furthermore, state and local governments also employ wildlife biologists, land management experts and other individuals with scientific training to develop detailed plans. Since state and local governments have already proven to be reliable partners in supporting critical species conservation efforts, we should also participate in threatened and endangered species recovery efforts, including the development of population recovery goals.

NACo also supports provisions in the draft legislation that would expand participation of state and local governments in efforts to ensure transparency in the development and use of scientific data during the listing and recovery processes. Counties believe that listing and delisting decisions should be based on the best available scientific data and a transparent decision-making process that follows consistent, reliable timelines. Counties also believe that collaborative agreements between the federal government, state and local officials, landowners and other stakeholders can create species conservation plans that balance community and economic needs with environmental protection.

The draft legislation also encourages the development of candidate conservation agreements that would be credited by the U.S. Fish and Wildlife Service when making a listing determination. The legislation would also require the federal government to honor the terms of candidate conservation agreements with assurances (CCAAs), promulgate regulations to expedite the creation of CCAAs, and support the development of these agreements to protect community and economic interests while ensuring habitat conservation needs are met.

Counties have also developed data that can assist federal agencies in resource management decisions and we encourage the federal government to use this data where available. For example, the State of Utah has provided funding to every Utah county government to develop its own resource management plan to coordinate management actions with federal agencies. Similarly, counties in Wyoming have worked with the academic community in developing county-level socioeconomic baseline data to use in development and land management decisions. These plans provide the federal government with existing, verifiable data and scientific information that can be incorporated into federal agency plans, further reducing timelines and ensuring data consistency. We appreciate that the draft legislation recognizes the unique and constructive role counties already play in the development of data and science and the need for the federal government to include state and local governing partners in developing the best possible species conservation policies.

NACo stands ready to work with you to promote balanced, locally supported solutions to species conservation challenges. We appreciate your efforts on this important issue and encourage you to continue your dialogue with interested parties as you craft the best possible ESA modernization package. Thank you for your continued support for counties on this and other issues affecting local governments.

Sincerely,

A handwritten signature in black ink that reads "Matthew D. Chase". The signature is written in a cursive style with a large, prominent loop at the beginning of the first name.

Matthew D. Chase
Executive Director
National Association of Counties