

July 13, 2018

The Honorable John Barrasso, MD, Chairman  
Senate Committee on Environment and Public Works  
410 Dirksen Senate Office Building  
Washington, D.C. 20510

Dear Chair Barrasso,

Rural Oregon Counties are very familiar with the impacts of the Endangered Species Act (ESA). The challenge of balancing the ecological, social and economic aspects of ESA listing decisions is one that Oregon's rural County Commissioners have faced over many years.

Oregon's rural county governments are increasingly concerned with our fraying economic and social fabric. As we see a decrease in natural resource jobs, and an increase in service sector jobs, rural Oregon is experiencing some of the highest rates of free and reduced-price school lunches in the state, and increases in child, spousal, and drug abuse. Jobs in the wood products manufacturing and trucking sectors in western Oregon pay between \$43 - \$51,000 per year. By way of comparison, jobs in the tourism sector pay between \$17 - \$21,000 per year.

The strength and resiliency of our rural communities depend on maintaining those high wage manufacturing jobs in natural resources.

In rural Eastern Oregon, ranching is an economic mainstay. Because most of the land is federally owned, being able to productively use public lands to graze cattle is pivotal to the economic viability of the job base and the communities it supports.

Oregon's rural County Commissioners appreciate a move toward a more collaborative recovery approach that combines State conservation agencies, local governments and stakeholders. We appreciate the bipartisan approach and extensive work that the Western Governors' Association has put into improving the ESA. The proposed Endangered Species Act Amendments of 2018 take positive steps forward to improve implementation of the ESA.

We support the draft's improved coordination and input from States. State conservation agencies have some of the best local knowledge and information about status of potentially listed species. They also have experience working collaboratively with local stakeholders.

The draft also elevates the use of Candidate Conservation Agreements with Assurances (CCAAs). The use of CCAA are a valuable tool in building conservation commitments among private, state and federal landowners, and conservation stakeholders to avoid the necessity of an ESA listing. Our Oregon ranching stakeholders are successfully working collaboratively with other private industry sectors, conservation groups and local, State and Federal governments to implement a CCAA for the Greater sage-grouse. An important addition to the draft is the safe-harbor provisions to provide regulatory certainty for landowners and other stakeholders to facilitate participation in conservation and recovery activities.

We support the increased transparency for state conservation agencies, local governments and stakeholders. The provisions regarding litigation transparency are especially important and will inform the role of litigation in driving management decisions over science-based efforts.

As the Committee deliberates on this Act, please consider the impact that ESA litigation is having on the management of species, the viability of our natural resource sectors, and the economic and social health of our counties and communities.

Just last April, a federal district court in Oregon ruled on an ESA lawsuit about the impacts of grazing on protected bull trout, finding that grazing was unlikely to have caused the decline in bull trout populations. Unfortunately, it took 15 years to reach a decision in this case. During this time, several ranchers gave up their grazing permits because the financial burden and uncertainty around the litigation had become too burdensome. The loss of these jobs and income in rural counties has a much greater social and economic impact than would be felt in more urbanized counties.

Thank you for your leadership on the Endangered Species Act Amendments of 2018. We look forward to working with you and the Committee as the legislation is considered further.

Sincerely,

A handwritten signature in black ink that reads "Craig Pope". The signature is written in a cursive, slightly slanted style.

Craig Pope, President  
Association of Oregon Counties

---