

January 25, 2018

Re: Oppose Efforts to Gut Safeguards Protecting Imperiled Species from Pesticides

Dear Senator/Representative:

The undersigned 258 conservation, consumer, agricultural, and other public interest groups urge you to oppose all efforts to weaken or gut Endangered Species Act requirements to address the effects of toxic pesticides on threatened and endangered species. The Endangered Species Act is our nation's most effective law for protecting wildlife in danger of extinction and has prevented the extinction of more than 99 percent of the species under its care. This vital law is supported by more than 90 percent of American voters.

Some members of the pesticide manufacturing industry are proposing legislation that would exempt their products from key Endangered Species Act safeguards. Their proposal would also exempt this industry from responsibility for the harms caused by pesticides to West Coast salmon, California condors, Florida panthers and a host of other imperiled species. These proposed changes would severely undermine the Endangered Species Act and have devastating consequences for our nation's threatened and endangered species.

Under current law, the Environmental Protection Agency (EPA) must consult with two expert agencies—the U.S. Fish and Wildlife Service and National Marine Fisheries Service (“the wildlife agencies”)—to identify and minimize impacts to endangered species caused by pesticide products that EPA registers for commercial use. When necessary, these science-based interagency consultations result in commonsense protections, such as limits on spraying pesticides in key areas where endangered species live.

The industry-proposed legislation would gut these longstanding requirements and instead put large corporate interests in control. In addition, this dangerous legislation would exempt all approved pesticide use from enforcement under the Endangered Species Act, even where it directly kills or injures endangered wildlife.

Our organizations are supportive of administrative innovations to improve interagency consultations on the impacts of pesticides on endangered species. The National Academy of Sciences made recommendations to do just that in a 2013 report. This process is already underway with a set of pilot consultations on three neurotoxic pesticides—chlorpyrifos, malathion and diazinon—and we support its continued implementation and refinement.

Unfortunately, in April of 2017, Dow AgroSciences asked EPA Administrator Scott Pruitt to stop all of his agency's work to assess the effects of these three pesticides on endangered species. This request came shortly after Mr. Pruitt defied his own agency's previous finding that chlorpyrifos is unsafe, especially to young children, by allowing it to remain on the market. We urge you to ensure that this interagency consultation process continues in earnest and that EPA and the wildlife agencies involved receive adequate funding.

Endangered species are often the early warning system to alert us to the unintended harms of pesticides. It was the catastrophic decline of the bald eagle, peregrine falcon and other endangered species that caused the U.S. Fish and Wildlife Service and other agencies to sound the alarm on DDT. Thankfully, the bald eagle, our national symbol, was saved from extinction by the protections afforded by the Endangered Species Act. The Act remains the “gold standard” for species protection and recovery today, both here and around the world. We ask you to protect this vital law, not only to save our most treasured rare plants and animals, but also to protect our waters, our lands, and our health. Please oppose all efforts to weaken the Act’s ability to protect our environment from toxic pesticides.

Sincerely,

NATIONAL ORGANIZATIONS

Advocates for Snake Preservation
All-Creatures.org
American Bird Conservancy
American Birding Association
American Indian Mothers Inc.
Animal Legal Defense Fund
Animal Welfare Institute
Animals Are Sentient Beings, Inc.
Avaaz
Avian Research and Conservation Institute
Basin and Range Watch
Beyond Pesticides
Bold Visions Conservation
Born Free USA
Boulder County Audubon Society
Center for Biological Diversity
Center for Food Safety
Center for Environmental Health
Citizens for Sludge-free Land
Clean Water Action
Coalition on the Environment and Jewish Life
Conservation Imaging, Inc.
Cornell Lab of Ornithology
Defenders of Wildlife
Desert Tortoise Council
Earthjustice
Ecosistemas Andinos
Endangered Small Animal Conservation Fund
Endangered Species Coalition
Food & Water Watch
For the Fishes
Friends of the Earth US
Fund for Wild Nature

Garden, Inc.
Great Old Broads for Wilderness
GreenFaith
GreenLatinos
Greenpeace
Hawk Mountain Sanctuary Association
Hilton Pond Center for Piedmont Natural History
Honor the Earth
Humane Society Legislative Fund
In Defense of Animals
International Bird Rescue
International Fund for Animal Welfare
International Marine Mammal Project of Earth Island Institute
Justice for Wolves
Moms Advocating Sustainability.org
Native American Community Board
Native Plant Conservation Campaign
Natural Resources Defense Council
Oceana
One More Generation
OneLessStraw
Peace and Freedom Party
Pesticide Free Zone
Power Shift Network
Predator Defense
Project Coyote
Public Employees for Environmental Responsibility
Public Lands Project of Rochester Area Vegan Society
Sailors for the Sea
Save Animals Facing Extinction
Save EPA
SAVE THE FROGS!
Saving Birds Thru Habitat
Sequoia ForestKeeper
Sierra Club
Slow Food USA
Spirit of the Sage Council
SustainUS
Tellus Institute
The Carl Safina Center
The Cougar Fund
The Humane Society of the United States
The Institute for Bird Populations
The Rewilding Institute
Tikkun's Network of Spiritual Progressives
Turtle Island Restoration Network
Urban Bird Foundation
Voces

Walden Woods Project
Waterkeeper Alliance
Western Watersheds Project
WildEarth Guardians
Wild Horse Education
Wilderness Watch
WilderUtopia
Wildlands Network
Wildlife Rescue & Rehabilitation Inc.

REGIONAL ORGANIZATIONS

Alabama

Alabama Environmental Council
Black Warrior Riverkeeper
Cahaba River Society

Alaska

Alaska's Big Village

Arizona

Grand Canyon Trust
Maricopa Audubon Society
Sustainable Arizona
Tucson Audubon Society

California

Alameda Creek Alliance
Antelope Valley Conservancy
Battle Creek Alliance, Defiance Canyon Raptor Rescue
California Chaparral Institute
Californians for Alternatives to Toxics
Californians for Pesticide Reform
Californians for Western Wilderness
Citizens Committee to Complete the Refuge
Endangered Habitats League
Environmental Action Committee of West Marin (EAC)
Environmental Protection Information Center
Friends of Harbors, Beaches and Parks
Friends of the Santa Clara River
Golden Gate Audubon Society
Klamath Forest Alliance
KyotoUSA
Moms Advocating Sustainability
Native Songbird Care & Conservation

North County Watch
Occidental Arts and Ecology Center
Pacifica Beach Coalition
Poison Free Malibu
Pomona Valley Audubon Society
Raptors Are The Solution
Redwood Region Audubon Society
San Bernardino Valley Audubon Society
San Francisco Baykeeper
San Joaquin Raptor/Wildlife Rescue Center
San Joaquin Valley Conservancy
Santa Clara Valley Audubon Society
The Urban Wildlands Group
Tuolumne River Trust
Ventana Wilderness Alliance
Watershed Alliance of Marin
Wild Nature Institute
WILDCOAST

Colorado

Animas Valley Institute
Blue Sky Rehabilitation
Boulder Rights of Nature, Inc.
Colorado State Beekeepers Association
Living Rivers & Colorado Riverkeeper
People and Pollinators Action Network
Rocky Mountain Recreation Initiative
Rocky Mountain Wild
San Juan Citizens Alliance
Wilderness Workshop

Delaware

Delaware Ecumenical Council on Children and Families
Green Delaware

District of Columbia

DC Environmental Network
Potomac Riverkeeper Network

Florida

Miami Waterkeeper
South Florida Wildlands Association
St. Johns Riverkeeper

Georgia

Georgia ForestWatch

Hawaii

Apollo Kauai

Conservation Council for Hawai'i

Maui Forest Bird Recovery Project

Idaho

Kootenai Environmental Alliance

Selkirk Conservation Alliance

WildLands Defense

Illinois

Bird Conservation Network

Chicago Audubon Society

Seven Generations Ahead

Indiana

Hoosier Environmental Council

Independent Environmental Conservation & Activism Network

South Bend-Elkhart Audubon Society

Iowa

Iowa Audubon

Kentucky

Kentucky Heartwood

Louisiana

Gulf Restoration Network

Orleans Audubon Society

Maine

Friends of Merrymeeting Bay

Maryland

Audubon Naturalist Society

Climate Stewards of Greater Annapolis

CSGA

Gunpowder RIVERKEEPER

Maryland Ornithological Society

Maryland Pesticide Education Network

Potomac Riverkeeper

Wicomico Environmental Trust

Massachusetts

Berkshire Environmental Action Team
Eastern Coyote/Coywolf Research
Mass Audubon
RESTORE: The North Woods

Michigan

Charter Sanctuary
Chocolay Raptor Center

Minnesota

Fairmont, MN Peace Group
Howling For Wolves
Mankato Area Environmentalists
Minnesota River Valley Audubon Chapter
Occupy Duluth
Pollinate Minnesota
Save Our Sky Blue Waters

Montana

Alliance for the Wild Rockies
Cottonwood Environmental Law Center
Friends of the Bitterroot
Friends of the Wild Swan
Speak Up For Wildlife Foundation
Swan View Coalition

Nebraska

Western Nebraska Resources Council

New Hampshire

Audubon Society of New Hampshire

New Jersey

Animal Protection League of New Jersey
Monmouth County Audubon Society

New Mexico

ON A WING AND A PRAYER
Southwest Environmental Center
Southwestern New Mexico Audubon Society
Upper Gila Watershed Alliance

New York

Citizens Campaign for the Environment

NYC Audubon

Save the Pine Bush

Wild Birds Unlimited of Syosset

North Carolina

Cape Fear River Watch

Dogwood Alliance

MountainTrue

NC WARN

The Canary Coalition

The Forest Foundation, Inc

Toxic Free North Carolina

Oregon

Beyond Toxics

Geos Institute

Greater Hells Canyon Council

Kalmiopsis Audubon Society

Klamath Riverkeeper

Klamath Siskiyou Wildlands Center

KS Wild

Northeast Oregon Ecosystems

Northwest Center for Alternatives to Pesticides

Northwest Environmental Advocates

Northwest Environmental Defense Center

Oregon Natural Desert Association

Salem Audubon Society

Wild and Scenic Rivers

Pennsylvania

Delaware Valley Ornithological Club

Juniata Valley Audubon Society

Pennsylvania Native Plant Society

Save Our Allegheny Ridges

South Carolina

Upstate Forever

Tennessee

Cumberland-Harpeth Audubon Society

Tennessee Clean Water Network

Tennessee Environmental Council
Tennessee Ornithological Society
Tennessee Riverkeeper

Texas

Texas River Revival

Utah

Uranium Watch
Wasatch Clean Air Coalition
Western Wildlife Conservancy
Yellowstone to Uintas Connection

Vermont

Vermont Center for Ecostudies

Virginia

Audubon Society of Northern Virginia
Friends of Dyke Marsh
Shenandoah Riverkeeper

Washington

Conservation Northwest
Friends of Bumping Lake
Kettle Range Conservation Group
Wolf Haven International

West Virginia

Upper Potomac Riverkeeper

Wisconsin

Madison Audubon
Raptor Services, LLC
Viroqua Biodynamic Group & Kickapoo Peace Circle
Western Great Lakes Bird and Bat Observatory, Inc.

Puerto Rico

Citizens of the Karst