**Proposed Changes to the Endangered Species Act Puts Wildlife at Risk**

By Jamie Rappaport Clark

In an [Opinion piece published Friday](https://www.washingtonpost.com/opinions/at-interior-were-ready-to-bring-the-endangered-species-act-up-to-date/2018/08/09/2775cd8e-9a96-11e8-b55e-5002300ef004_story.html?utm_term=.012e20e0dd21), Deputy Secretary of the Interior David Bernhardt proclaimed that the Trump administration is “ready to bring the Endangered Species Act up to date.” That statement alone should be enough to give people concerned about the survival of our imperiled wildlife chills. We have heard repeatedly, from hostile members of Congress, from development and extraction interests, and now from the Trump administration, that the Endangered Species Act needs to be “modernized.” That has invariably turned out to mean “undermined” or even “gutted.” Americans cherish wildlife and care deeply about the protection of endangered species; we should not be deceived by the placating language used by those who would undercut those values.

Mr. Bernhardt argues that the new Endangered Species Act regulations proposed by the Department of the Interior would enhance conservation of our most imperiled wildlife. The truth is the opposite. For more than 25 years, the U.S. Fish and Wildlife Service (FWS) has provided the full protection of the law to threatened species except where it finds, on a case-by-case basis, that the species does not need such protection for its conservation. That is a prudent approach because threatened species are in fact highly imperiled – likely to become at risk of extinction in the foreseeable future – and the line between endangered and threatened is often very difficult to determine. Now the Trump administration proposes to flip that prudent approach on its head, declaring that threatened species deserve no protection except where the FWS develops a special rule granting it some measure of security. That would leave threatened species at risk if FWS lacks the resources (in its already starved budget) to write a customized special rule - or if political or economic pressure leads the Trump administration to simply leave the species exposed to harm from development and mineral extraction.

And there is much more to be concerned about in this sweeping proposal to rewrite the way the federal government implements the Endangered Species Act. Despite admitting that Congress mandated that the decision to list a species as threatened or endangered must be made solely on science, the Trump administration is proposing to require the FWS to analyze and display economic costs that may be associated with protecting the species. That can only lead to inappropriate pressure on what must be a purely scientific judgment. Congress recognized in enacting the law that we cannot determine the relative value of individual species; all life has incalculable value. Identifying hypothetical costs without knowing where a species fits into the web of life – whether it may prove to be our salvation from cancer or provide the indispensable habitat for an entire ecosystem – is simply irresponsible. The proposed rules also contemplate sharply and inappropriately restricting the duty of federal agencies to consider the effects of their actions on listed species, allowing agencies like the Corps of Engineers to blind themselves to the impacts of upland development triggered by federal permits, or the ongoing impacts of major dams on imperiled salmon.

These proposals are no way to “enhance” the conservation of imperiled species.

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