

September 13, 2023

President Joseph R. Biden Jr.  
The White House  
1600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20500

**Re: Meeting the Challenges of the Biodiversity and Extinction Crisis Over the Next 50 Years**

Dear Mr. President:

The Endangered Species Act is one of the most successful conservation laws ever enacted by any nation. It has prevented the extinction of the overwhelming majority of wildlife and plant species under its protection. As our country, the Departments of the Interior and Commerce, and our organizations all commemorate the 50th anniversary of the Act and its extraordinary achievements, we must recognize that our planet faces an existential crisis with more and more species facing extinction in the coming decades.

Thus, as we reflect and celebrate the Endangered Species Act's achievements, we ask that you initiate bold action that mobilizes the entirety of the federal government to stem the loss of biodiversity and halt the global extinction crisis. Importantly, this includes consulting with Tribal governments and honoring federal trust obligations to Tribal communities, which has too often been overlooked and under prioritized. To truly be a success, a whole-of-government approach must also recognize and incorporate indigenous knowledge and practices to support conservation and biodiversity, safeguard the rights and needs of indigenous peoples, and ensure social equity and justice in decision-making.

The unraveling of the natural world remains a fundamental threat to the well-being of all humanity, which depends on millions of species and the countless services that the web of life provides. Each extinction brings closer the collapse of these planetary life-support systems, including carbon sequestration, pollination, water purification, oxygen production and disease regulation. To regain the United States' position as a global leader in conservation and prevent mass extinctions, we all must take swift action that matches the extent and scale of the problem. Accordingly, we ask you to take the following bold actions so that national policies to prevent extinction, recover species, and address the biodiversity crisis are even more successful during the next 50 years than they have been in the previous 50 years.

**1. Implement Whole of Government Approaches to Saving Biodiversity and Endangered Species**

A national biodiversity strategy is needed to articulate the nation's commitment to stemming the biodiversity and extinction crises at home and abroad. The strategy would serve as a blueprint for a whole-of-government response to tackling species extinction and addressing the primary threats to biodiversity, ecosystem services and ultimately, humanity. The strategy should address the five drivers of biodiversity loss — habitat degradation and fragmentation, climate change, wildlife exploitation, invasive species, and pollution; secure and restore critical ecosystem services; and reestablish the nation as a global leader in biodiversity conservation.

This approach would mobilize a stronger, more coordinated national response to the existential challenge we are facing. The strategy would direct federal agencies to pursue actions within existing laws and policies and promote innovation for developing new tools to protect biodiversity. It would also provide governments, corporations, and non-profits with a roadmap for actions needed to address the crisis' major drivers.

## **2. Boost Recovery of Endangered Species Through Robust Funding and Engaging Agencies Across Government**

The Endangered Species Act has been fiscally starved for decades and, as a result, has been severely compromised from realizing its full potential. The U.S. Fish and Wildlife Service currently receives less than half of the funding required to fully implement the Act's mandate to recover listed species. The Department of the Interior should support, and the Congress should fund, an increase to well over \$800 million for the Service's endangered species conservation. Significant increases also should be provided for the National Marine Fisheries Service Protected Resources Science and Management program.

In addition, the Endangered Species Act contains a long-neglected requirement found in Section 7(a)(1) that requires all federal agencies to prioritize the conservation and recovery of endangered species. Unfortunately, most federal agencies have not fully embraced their obligation, and some have patently ignored their obligation to conserve listed animals and plants. Thus, the Departments of the Interior and Commerce should:

- Direct all federal agencies — in consultation with Tribal and Indigenous communities — to finalize proactive conservation programs that advance the conservation of endangered species and help to restore declining wildlife and plants.
- Direct the Secretary of the Interior, through the U.S. Fish and Wildlife Service, and the Secretary of Commerce, through the National Marine Fisheries Service, to establish minimum requirements for what a conservation program shall include. The goal and guiding principle of any such program must ultimately be the proactive, landscape-level conservation and recovery of the species.

## **3. Adopt an Ambitious Ecosystem-based Framework to Recover Endangered Species and Rebuild America's Wildlife Populations**

Globally, one million animal and plant species face extinction within the coming decades and millions more are declining as habitat loss, climate change, wildlife exploitation, pollution, and other human activities continue to threaten their survival. In North America alone, we have lost nearly three billion birds since 1970.<sup>1</sup> During that same time frame, global wildlife populations have declined by an average of 69%.<sup>2</sup> Here in the United States, nearly half of all ecosystems are at risk of range-wide collapse.<sup>3</sup>

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<sup>1</sup> Rosenberg, L. V. et al. *Decline of the North American avifauna*. Science (2019).

<sup>2</sup> WWF (2022) *Living Planet Report 2022 – Building a nature positive society*. Almond, R.E.A., Grooten, M., Juffe Bignoli, D. & Petersen, T. (Eds). WWF, Gland, Switzerland.

<sup>3</sup> NatureServe, *Biodiversity in Focus: United States Edition* (2023).

Conserving threatened and endangered species is not limited to merely preventing their extinction. Under the Endangered Species Act, the conservation of listed species encompasses the much more ambitious goal of recovering them “the point at which the measures provided pursuant to this Act are no longer required.”<sup>4</sup> Yet despite the paramount importance of recovery in the Endangered Species Act, the concept of what “recovery” means remains poorly defined. In addition, recovery criteria are often inconsistently applied across species and lack a clear biological rationale. The current approach too often focuses exclusively on biological extinction risk to gauge recovery and fails to consider the important roles myriad species play in the ecosystems they live in. For example, when a keystone species disappears, the entire ecosystem is disrupted, causing cascading changes that can have harmful, far-ranging consequences.

Thus, confronting the widespread loss of biodiversity will require the Biden administration to implement a more ambitious, ecosystem-based framework that not only repairs what has been harmed but rebuilds populations of wildlife and plant species so that our natural heritage can be preserved for generations and centuries to come. Perhaps the best example of what recovery should look like is the Bald Eagle, which achieved healthy and increasing populations in nearly all 50 states and is now a meaningful part of a diverse spectrum of habitats and ecosystems.

Therefore, we urge the Biden administration to rapidly adopt a more holistic approach to recovery that considers not only minimum viable populations, but also a species’ role in the ecosystems it inhabits, as the Act originally envisioned. In doing so, the administration should prioritize the protection of key areas that will increase ecosystem resiliency and preserve biodiversity hotspots in the United States, the habitat of critically endangered species, and the diversity of habitats found across the nation.

Combating the global wildlife extinction crisis, stemming the loss of biodiversity, and restoring our natural heritage will require the Biden administration to be bolder and more visionary than any other administration in history. There is no time to waste. The actions we take today will affect whether future generations live in a world where Polar Bears and Monarch Butterflies still exist, or one where they can only be found in zoos. Thus, we urge the Biden administration to take these bold steps to ensure that the Endangered Species Act and much-needed, new initiatives to conserve biodiversity continue to save and restore the natural world around us for another 50 years and beyond.

Sincerely,

Center for Biological Diversity  
Defenders of Wildlife  
Endangered Species Coalition  
2020 Action  
7th Generation Advisors  
Advocates for Snake Preservation  
Alameda Creek Alliance  
Alaska Wilderness League  
American Bird Conservancy

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<sup>4</sup> 16 U.S.C. 1532(3). *See also, Gifford Pinchot Task Force v. U.S. Fish & Wildlife*, 378 F. 3d 1059 (9th Cir. 2004).

American Indian Mothers  
Animal Defenders International  
Animal Legal Defense Fund  
Animal Protection League of New Jersey  
Animal Protection New Mexico  
Animal Welfare Institute  
Animals Are Sentient Beings  
Animas Valley Institute  
Apex Protection Project  
Appalachian Mountain Advocates  
Appalachian Voices  
Attorneys for Animals  
Audubon Society of Central Arkansas  
Basin and Range Watch  
Bat Conservation International  
Beyond Pesticides  
Bird Conservation Network  
Bold Visions Conservation  
Boulder Rights of Nature  
Buffalo Field Campaign  
California Native Plant Society  
California Wildlife Foundation  
Californians for Western Wilderness  
Carnivore Coexistence Lab  
Cascadia Wildlands  
Center for Food Safety  
Christian Council of Delmarva  
Christians Caring for Creation  
Ciudadanos del Karso  
Clean Water Action  
Coal River Mountain Watch  
Colorado Native Plant Society  
Colorado Wolf and Wildlife Center  
ColoradoWild  
Conservancy of Southwest Florida  
Conservation Alabama  
Conservation Connection Foundation  
Conservation Law Foundation  
Consolidated Oregon Indivisible Network (COIN)  
Coosa River Basin Initiative  
Coosa Riverkeeper  
Copper Canyon Alliance  
CORALations  
Coyote Watch Canada  
Deer Creek Valley Natural Resources Conservation Association  
Defiance Canyon Raptor Rescue and Battle Creek Alliance

Desert Tortoise Council  
Dogwood Alliance  
Down to Earth Apiaries  
Eagle Summit Wilderness Alliance  
Earth Day Initiative  
Earth Ministry/Washington Interfaith Power and Light  
EarthAction  
Earthjustice  
EarthPath Sanctuary  
Eastern Coyote/Coywolf Research  
EcoFlight  
Endangered Habitats League  
Environmental Action  
Environmental Action Committee of West Marin  
Environmental Investigation Agency  
Environmental Center of San Diego  
Environmental Law & Policy Center  
Environmental Protection Information Center  
Farmer Frog  
Fisheries Conservation Foundation  
Florida Turtle Conservation Trust  
Florida Wildlife Federation  
Footloose Montana  
Forest Keeper  
Forest Web  
Foundation Earth  
Four Paws USA  
Friends of Big Ivy  
Friends of Blackwater  
Friends of the Bitterroot  
Friends of the Earth  
Friends of the Inyo  
Friends of the San Juans  
Georgia Audubon  
Georgia Conservancy  
Georgia Interfaith Power and Light  
Glen Canyon Institute  
Glynn Environmental Coalition  
Grand Canyon Trust  
Grand Canyon Wolf Recovery Project  
Grand Junction Area Broadband - Great Old Broads for Wilderness  
Greenpeace USA  
Great Lakes Wildlife Alliance  
Great Old Broads for Wilderness  
GreenFaith  
GreenLatinos

Healthy Ocean Coalition  
Heartwood  
Helena Hunters and Anglers Association  
High Country Conservation Advocates  
Howling For Wolves  
Humane Action Pittsburgh  
I Heart Pisgah  
Illinois Environmental Council  
In Defense of Animals  
Information Network for Responsible Mining  
Interfaith Power & Light  
Interfaith Vegan Coalition  
International Marine Mammal Project of Earth Island Institute  
International Wildlife Coexistence Network  
Intheshadowofthewolf  
Jemez Peacemakers  
Juniata Valley Audubon Society  
Justice for Wolves  
JUJustice Washington, UU State Action Network  
Kentucky Heartwood  
Kentucky Link Coalition  
Kentucky Waterways Alliance  
Kettle Range Conservation Group  
Kickapoo Peace Circle  
Klamath Forest Alliance  
Klamath Siskiyou Wildlands Center  
KyotoUSA  
La Purisima Audubon Society  
Lake Tahoe Wildlife Care  
Large Carnivore Fund  
Lassen Forest Preservation Group  
League of Conservation Voters  
League of Humane Voters of New Jersey  
League of Humane Voters Wisconsin  
Living Rivers & Colorado Riverkeeper  
Living with Wolves  
Los Angeles Audubon Society  
Los Padres ForestWatch  
Madrean Archipelago Wildlife Center  
Maine Friends of Animals  
Maine Organic Farmers and Gardeners Association  
ManaSota-88  
Miami Waterkeeper  
Montana Conservation Voters Education Fund  
Montana Environmental Information Center  
Monterey Bay Aquarium

National Aquarium  
National Ocean Protection Coalition  
National Wildlife Refuge Association  
National Wolfwatcher Coalition  
Natural Resources Defense Council  
NC WARN  
NETWORK Lobby for Catholic Social Justice  
Nevada Wildlife Alliance  
New Hampshire Wildlife Coalition  
New Mexico Audubon Council  
New Mexico Wild  
North American Butterfly Association  
Northeast Oregon Ecosystems  
Northeastern Minnesotans for Wilderness  
Northern California Council, Fly Fishers International  
Northwest Environmental Defense Center  
Nuclear Energy Information Service (NEIS)  
NY4WHALES  
NYC Plover Project  
Ocean Alliance  
Ocean Conservation Research  
Ocean Defense Initiative  
Oceana  
Oceanic Preservation Society  
Ohio Animal Advocates  
One More Generation  
OneNature  
Orca Network  
Oregon Wild  
Partnership for Policy Integrity  
Pelican Island Audubon Society  
Pennsylvania Society for Ornithology  
People & Pollinators Action Network  
People for Protecting Peace River  
Plan B to Save Wolves  
Plant Based Treaty  
Portland Audubon  
Portneuf Resource Council  
Prairie Protection Colorado  
Predator Defense  
Project Coyote  
Public Citizen  
Public Employees for Environmental Responsibility  
Public Lands Project  
Puget Soundkeeper  
Raptors Are The Solution

Resource Renewal Institute  
RESTORE: The North Woods  
Rock Creek Alliance  
Rocky Mountain Wild  
San Bernardino Valley Audubon Society  
San Francisco Baykeeper  
San Luis Valley Ecosystem Council  
Sage Steppe Wild  
Save Animals Facing Extinction  
Save Our Allegheny Ridges  
Save Our Cabinets  
Save Our Wild Salmon Coalition  
Save Our Sky Blue Waters  
Save The Colorado  
SAVE THE FROGS!  
Save the Manatee Club  
Save the Pine Bush  
Seattle Aquarium  
Selkirk Conservation Alliance  
Sequoia ForestKeeper  
Sheep Mountain Alliance  
Shoals Environmental Alliance  
Sierra Club  
Sierra Forest Legacy  
Sierra Foothills Audubon Society  
Silvix Resources  
Sisters of Charity of Nazareth Western Province Leadership  
Sisters of St. Francis of Philadelphia  
Social Compassion in Legislation  
Social Justice Commission (Episcopal Diocese of Western Massachusetts)  
Sound Action  
South Carolina Aquarium  
South Florida Wildlands Association  
Southern Environmental Law Center  
Southern Oregon Climate Action Now  
Southern Utah Wilderness Alliance  
Speak for Wolves  
Stillwaters Environmental Center  
Surfrider Foundation  
Sustainable Arizona  
Tennessee Riverkeeper  
Texas Humane Legislation Network  
The 06 Legacy  
The Coalition for Conservation Genetics  
The Coalition to Protect America's National Parks  
The Cougar Fund



The Miami Blue Chapter of the North American Butterfly Association  
The #RelistWolves Campaign  
The Safina Center  
The Society of Conservation Biology North America  
The Urban Wildlands Group  
Tropical Audubon Society  
Trap Free Montana  
Trap Free Montana Public Lands  
Tuolumne River Trust  
Turtle Island Restoration Network  
Upper Etowah River Alliance  
Upper Peninsula Environmental Coalition  
Urban Bee San Francisco  
Ventana Wilderness Alliance  
Vets for Peace  
Voices of Wildlife in NH  
Watershed Alliance of Marin  
WaterWatch of Oregon  
Web of Life Products  
Western Environmental Law Center  
Western Watersheds Project  
Western Wildlife Conservancy  
Western Wildlife Outreach  
Whidbey Environmental Action Network  
Wild Orca  
Wild Nature Institute  
WildEarth Guardians  
Wilderness Southeast  
Wilderness Watch  
Wilderness Workshop  
Wildlife Conservation Society  
Wildlife for All  
Winter Wildlands Alliance  
Wishtoyo Chumash Foundation  
Wolf Conservation Center  
Wolf Education and Research Center  
Wolves of the Rockies  
Wyoming Coalition for Animal Protection  
Wyoming Wildlife Advocates  
Xerces Society for Invertebrate Conservation  
Yaak Valley Forest Council  
Zero Hour  
Zoo New England: Franklin Park Zoo & Stone Zoo