



EDF Principles on Effective Wildlife Conservation Policy

August 2017

The following principles describe Environmental Defense Fund's (EDF) position on effective wildlife conservation policy, including America's bedrock wildlife policy – the Endangered Species Act (ESA). EDF experts will evaluate policy and proposed changes or amendments with these principles in mind.

- 1) **MAINTAIN EFFECTIVENESS:** EDF rejects any policy changes that are likely to diminish the effectiveness of the ESA in preventing the extinction, and furthering the recovery, of listed and unlisted species and the conservation of the ecosystems on which they depend.
- 2) **ADMINISTRATIVE EFFICIENCY:** EDF supports measures that improve the efficiency or lessen the burdens associated with the ESA, provided they are consistent with principle #1.
- 3) **STRONG SCIENCE:** EDF supports requirements to use the best available science in ESA decision-making, including the listing of species. EDF also support strengthening the integrity of the scientific process and maintaining financial resources available to support agency-led science efforts. Scientific data collected by states, tribes, and local entities that meets established scientific standards should be taken into account in ESA decision-making. Consistent, science-based, functional accounting should be utilized for habitat quality assessments, acreage goal setting and habitat conservation planning.
- 4) **PRIORITIZE HABITAT CONSERVATION:** Given that degradation and loss of habitat is the overriding threat to most species, the ESA must utilize measures (both regulatory and non-regulatory) focused on habitat conservation, including landscape-scale planning efforts where appropriate. Landscape-scale planning and ecosystem conservation should be prioritized to protect the habitats upon which species (both listed and unlisted) depend.
- 5) **PRIORITIZE PRE-LIST CONSERVATION:** Efforts should be made to conserve at-risk species and their habitats before they are listed, which could preclude the need for listing if successful.
- 6) **ONCE LISTED, PRIORITIZE RECOVERY:** Clear, science-based recovery goals should exist for listed species, and species should be considered for delisting or downlisting when recovery goals have been met.

- 7) **APPLY MITIGATION HIERARCHY:** The full mitigation hierarchy should be applied when a public or private project will impact habitat or diminish the viability of listed species. Compensatory mitigation (offsets) are an essential component of the hierarchy and must be implemented using standards equivalent to habitat exchanges.
- 8) **PRIORITIZE INCENTIVES:** Creating or expanding incentives (economic and regulatory) for private property owners and governmental agencies to further species conservation should be a priority, both before and after listing decisions.
- 9) **ADAPT TO CHANGING CONDITIONS:** Some latitude for experimentation in ESA implementation by the federal Services and the states should be provided and encouraged, especially in the face of climate change.
- 10) **ENSURE AGENCY CAPACITY, RESOURCES:** Adequate funding, both for the federal Services and the states, is essential to fulfill the priorities described in principles #1-9. This includes adequate funding for ESA implementation by the Services, adequate funding and incentives for ESA-related conservation and planning at state and local levels, and adequate funding for timely reviews to increase flexibility and efficiency of decision-making, including delisting and downlisting.