



July 10, 2018

The Honorable Paul A. Gosar, D.D.S.
Chairman
Congressional Western Caucus
2057 Rayburn House Office Building
Washington, DC 20510

Dear Chairman Gosar:

On behalf of the National Association of Counties (NACo) and the 3,069 counties, parishes and boroughs we represent, thank you for your efforts to modernize the Endangered Species Act (ESA). Counties appreciate the Congressional Western Caucus' leadership in developing common sense bills that ensure the maximum level of involvement for county governments in ESA processes and that policies are based on the best-available scientific data. If enacted, the bills drafted by the Western Caucus' membership would greatly improve how the federal government protects species and conserves their habitat.

Counties strongly support provisions in the draft bills that ensure greater consultation and coordination with state and local governments in the development of listing decisions and species recovery goals. State and local governments serve as important partners with the federal government in resource and wildlife management decisions and employ individuals with scientific training who can assist the federal government in developing management plans. Species listing and recovery decisions should be based on the best available scientific data and consistent, reliable timelines. Counties have also developed data that can assist our federal partners in species conservation plans, and we encourage the federal government to use this data where available. Since state and local governments serve as reliable partners in wildlife and habitat management, we should also participate in threatened and endangered species recovery efforts.

Several western states have assisted counties in developing their own resource management plans and baseline socioeconomic data to provide the federal government with existing, verifiable and scientific information that can be used by federal agencies, which can reduce timelines and ensure data consistency in species and habitat management. We appreciate that the draft legislation recognizes the need for the federal government to include state and local governing partners in developing the best possible species conservation policies. If federal, state and local governments craft and implement resource management decisions in good faith, policies would be more widely accepted by local residents, thus ensuring the possibility of future cooperation on other issues.

Further, the draft bills encourage the development of cooperative agreements with state and local governments to better manage species habitat, including codifying candidate conservation agreements with assurances (CCAAs). The development of CCAAs would ensure species and habitat conservation needs are met while community and economic development are not jeopardized. Throughout the nation, CCAAs have already produced positive results for habitat conservation. If the draft bills were

enacted, the federal government would have greater opportunities to find collaborative, innovative solutions to species protection issues.

NACo will continue to work with the Congressional Western Caucus to promote these modern, locally-supported solutions to the ESA. We hope Congress will address ESA modernization this year. Counties also encourage the Western Caucus leadership to maintain an open dialogue with other interested parties on ESA improvement. Thank you for your continued support for county governments.

Sincerely,

A handwritten signature in black ink that reads "Matthew D. Chase". The signature is written in a cursive style with a large, prominent loop at the beginning of the word "Matthew".

Matthew D. Chase
Executive Director
National Association of Counties