Chairman Gosar and members of the Western Caucus, on behalf of the National Association of Counties, thank you for your invitation to offer our thoughts on how to improve the Endangered Species Act (ESA). Counties appreciate your work to modernize the ESA is implemented to better protect species using the best scientific data and utilizing cooperative efforts available under our unique federal system of government.

Counties recognize the importance of the ESA as an essential safeguard for America’s wildlife. We therefore support updating the ESA to better achieve its goal of species recovery. Counties believe the following concepts would help to meet species recovery goals without negatively impacting the relationship between the federal government and local partners, while also protecting vital economic opportunities for communities:

- **Mandate the delisting of a species when recovery goals are met.** The aim of the ESA is to recover populations of threatened and endangered species to healthy and viable levels. Some examples of delisted species whose populations recovered due to ESA protections include the Steller Sea Lion, the Gray Whale, and of course, the Bald Eagle. These delistings should be celebrated among our nation’s greatest conservation achievements.

- **Require federal agencies to perform cumulative and quantitative economic analyses, before listing decisions or the designation of critical habitat.** This will help to balance economic and conservation needs in the implementation of the ESA. Federal agencies should understand the economic reality on the ground in local communities and consider how their decisions impact residents before final decisions are made.

- **Finally, and perhaps most crucially, state and county governments must be treated as equal partners in the listing process, including the designation of critical habitat and the development of other plans to promote species recovery.** Counties across the country partner with federal and state agencies in wildlife management and habitat conservation efforts, including the adoption of land or wildlife management plans which may include scientific data related to a listed or candidate species. Counties
can also work with the public and federal agencies in unique ways so that local needs are protected while legal mandates under the ESA are met.

For example, the Oregon spotted frog was listed as threatened in 2014. Initial critical habitat plans included private lands within the Glenwood Valley in Klickitat County, Washington. The county responded to the landowners’ concerns by convening meetings with federal and state wildlife officials that eventually led to 20 landowners signing a cooperative agreement incorporated into the frog’s critical habitat, balancing the needs of the species with those of the landowners. It was a win-win for the frog and the residents of Klickitat County.

Thank you again for holding today’s roundtable. We must improve the ESA so that species recovery and habitat conservation is driven by collaborative, consensus-driven efforts that protect the needs of local communities. Counties urge Congress to act on ESA modernization quickly.