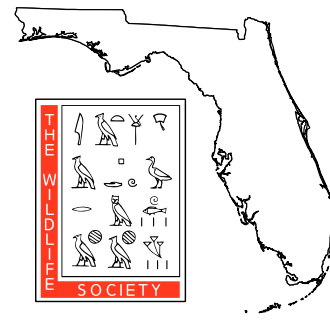


Florida Chapter
THE WILDLIFE SOCIETY
www.fltw.org



5/18/25

Transmitted electronically

Florida Chapter of The Wildlife Society Statement on the Proposed Rescinding of ‘Harm’ in the Endangered Species Act

THE PROBLEM:

The legacy of the Endangered Species Act (ESA) as a global example of responsible stewardship that has worked to protect wildlife in the United States is currently being jeopardized. Rescinding the definition of ‘harm’ in the ESA will remove protections to listed species habitat which are critical to the success of the ESA. Habitat loss is the leading cause of species’ decline (Hogue and Breon 2022), thus this change to the ESA will undermine the ability to protect and recover vulnerable species. Further, this change will diminish the original intent of the ESA to remove species from the endangered species list and to prevent species from becoming listed. This proposed action will undoubtedly have severe and long-lasting ramifications that will undermine our nation’s commitment toward wildlife conservation.

To remove habitat protections for a species, one would also remove vital resources responsible for the survival and longevity of the species. It is unreasonable to expect a species to persist for long without necessary food, water, shelter, or breeding grounds. Many of the species protected by the ESA have very specific habitat needs that cannot be met in alternate locations. Consequently, unregulated habitat destruction will cause the decline of habitat-specific species such as the Florida scrub-jay (*Aphelocoma coerulescens*) and sand skink (*Neoseps reynoldsi*), two species currently Federally listed as Threatened.

IMPACTS TO FLORIDA:

Florida is home to many endemic species, of which many are also Federally protected, that do not exist anywhere else. The proposed rescinding of ‘harm’ from the ESA thus has a disproportionate impact on Florida in particular.

- The charismatic Florida panther (*Puma concolor coryi*) is one such endangered species that would not exist without habitat protections. The Florida panther requires large, connected areas of suitable habitats to roam while foraging for prey. Urbanization, habitat fragmentation and habitat degradation have all been cited as causes for their drastic declines (Frakes et al. 2015).

Other Federally listed species have population strongholds in Florida due to the existing habitat protections.

- Known as the ‘Emperor of the Forest’ due to its large body size and commanding role in longleaf pine ecosystems, the eastern indigo snake (*Drymarchon couperi*; Federally Threatened) is at greatest risk of continued declines due to habitat alteration and associated road mortality (Enge et al. 2013). Like the Florida panther, eastern indigo snakes require large contiguous tracts of habitat.

Florida is also home to one of the most iconic ESA success stories, the American alligator (*Alligator mississippiensis*). Listed on the original ESA, the American alligator population in the US was at concerning, low levels in the 1960s and 1970s due to overexploitation. Fortunately, the ESA protections allowed the species to rebound. Today, Florida is home to 1.2 million alligators. Highlighting ESA success stories only emphasizes the important role that the ESA plays on conserving wildlife just as it is today.

ANTICIPATED FLORIDA IMPACTS:

The economic impact of this decision should also be considered. The value that rare species bring to a landscape can significantly increase tourism to a location (Booth et al. 2011). Ecotourism is a multi-billion-dollar industry in Florida, represents a significant amount of the state's revenue, and supports thousands of jobs annually (OEDR 2024). Species such as the Federally Threatened Florida manatee (*Trichechus manatus latirostris*) are one such charismatic species that tourists enjoy at many of Florida's natural areas. Additionally, habitat protections for listed species benefit game species, which further contributes to the state's economy. This proposed change threatens lands that are currently protected and opens them to habitat degradation, threatening natural resources responsible for attracting the state's 18 million visitors annually.

Lastly, this decision will have impacts to both public and private lands as both are actively engaged in endangered species conservation. Most endangered species ranges cover vastly more private land area than public lands (Clancy et al. 2020).

- The red-cockaded woodpecker (*Dryobates borealis*), is a federally threatened species that has suffered significant habitat declines with the sixth largest population residing on private lands of north Florida and south Georgia. Without habitat protections, private landowners may disengage with habitat conservation measures which would further degrade habitat.

Additionally, resources for private landowners may be lost such as previous cost-share programs for habitat management for the red-cockaded woodpecker on private lands. Protecting habitat for species like the red-cockaded woodpecker supports many other endemic species as well. Thus, conservation efforts aimed at listed species often benefit many others, including game species which provide additional value to the land.

FINAL THOUGHTS:

Rescinding the definition of 'harm' will cause immediate impacts to vulnerable wildlife with many long-term consequences including, but not limited to, additional species becoming listed, fewer species being delisted, lost opportunities for future hunting and fishing, and negative economic impacts in Florida and across the country. For this reason, the Florida Chapter of The Wildlife Society condemns any attempt to weaken the ESA and cautions against the continuing erosion of our country's natural resources.

We, the Florida Chapter of The Wildlife Society, representing a membership of over 250+ wildlife professionals, researchers, biologists, and land managers dedicated to science-based conservation across Florida, respectfully recommend the following:

1. Withdraw the proposed rule in its entirety, maintaining the existing definition of "harm" that reflects the ESA's purpose and legal precedent.

2. If changes are pursued, defer action until Congress or the courts provide clear interpretive direction on the scope of “harm” under “take.”
3. Engage the scientific community in any future revisions to ensure changes reflect ecological realities and conservation best practices.

Sincerely,



Maria B. Zondervan, Past President
Florida Chapter of the Wildlife Society

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