



Kentucky Chapter of The Wildlife Society

"Excellence in Wildlife Stewardship Through Science and Education"

Date: 5/8/2025

To: USFWS

From: The Kentucky Chapter of The Wildlife Society

Subject: Comment on Changes to the Endangered Species Act

The Kentucky Chapter of The Wildlife Society represents >100 wildlife biologists and other natural resources professionals and students from Kentucky. Our professional members are employed in both private sector and public service through state and federal agencies, non-governmental organizations, universities and colleges, and private enterprises. The missions of each of these entities all relate to one main goal, which is to help conserve wildlife and other natural resources for current and future generations. Given that, the Chapter is **fully against** the recommended changes put forth for the definition of harm within the Endangered Species Act in the spring of 2025. It is our stance that any change in the definition of harm that 1) removes protections from areas classified as critical habitat and 2) eliminates the protections of currently unoccupied habitat (i.e., potentially occupied habitat in the future) for endangered and threatened species within the United States would degrade the ability of the law to fulfill both its formally written goals and those that were intended when the law was created. Though our ultimate goal is to work toward preventing the listing of imperiled species through proactive conservation actions, if a species does become listed under the ESA, our next goal is to have the species no longer require protections under the act. Areas that are unoccupied but that currently meet the habitat requirements for a species are important to achieve this delisting goal. The Endangered Species Act, though not perfect, is a policy that is vital to maintaining our wildlife for current and future generations. The proposed change would be a drastic step backwards in working to have a sustainable future that benefits both our natural resources while maintaining ecosystem function and ultimately the ecosystem services we rely on.

Sincerely,

Andrea Darracq

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Current President

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