



Opposition to 2025 Proposed Amendments to the Endangered Species Act

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Thank you for the opportunity to comment on the language changes to regulations for section 4 of the Endangered Species Act of 1973. I am an Associate Professor at Georgia Institute of Technology, and my research includes environmental policy. I specifically write to oppose the changes to Section 424.11, which would “remove the phrase ‘without reference to possible economic or other impacts of such determination’ from the end of 50 CFR 424.11(b).” Based upon my research, I believe that the choice to include economic impacts to the consideration of preserving threatened species is folly, and it may actually impede economic development over time.

In my research on water conservation policy, I found that individuals and groups who evaluated water policy from the standpoint of their particular economic interests were unable to adequately protect their water resources. However, when all parties were required by law to take the interests of an endangered species into account, they were able to preserve their resources at a more robust level – so much so, that all the parties in the region ended up with greater economic development than they would have otherwise. Once the needs of maintaining a species were taken into consideration, the various interested factions had *greater* economic development. Had the U.S. Fish and Wildlife Service taken “economic impact” into consideration for protecting the species, the parties would likely not have successfully preserved their water resources, which would have harmed their overall economic development. In the end, all parties were grateful that they were legally forced to preserve the local species as it preserved local water supplies for human use as well. To sum up:

- Protecting a species enhances economic development in the region beyond the projected loss to any particular industry at the moment.
- Species preservation sets a floor for depletion of resources in the area, which then also sustains them for human use and continued economic growth.

The claim that decisions be made on the “basis of the best scientific and commercial data available,” does not itself preclude that economic impacts *do not shape* decision-making. Without the legal requirement, the various interests in my research would not be forced to find a solution that maintained their local resources and preserved economic development over the long term. Short-term interests over resources are often too intractable to reach a political solution unless the needs of a non-human interest set the floor for continued resource depletion – and it is only legal requirements that can insist on this minimum metric.