

Freshwater Mollusk Conservation Society



April 15, 2009

Secretary Gary Locke
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

RE: Restoring formal consultation requirements to Endangered Species Act

Dear Secretary Locke,

The Freshwater Mollusk Conservation Society (FMCS) is writing to support the reauthorization of the consultation requirements (Section 7) of the Endangered Species Act (ESA). We previously submitted a letter dated Sept 12, 2008 opposing the Bush Administration's proposed changes to the ESA and are now taking this opportunity to state our support for overturning this decision.

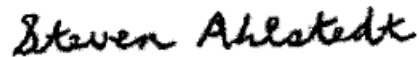
FMCS is dedicated to the conservation of and advocacy for freshwater mollusks, North America's most imperiled animals. The membership of FMCS consists of state, federal, academic, and private biologists, many of whom work directly with the nearly 150 endangered and threatened mollusks, and are considered experts in their conservation and recovery.

We believe that the process that had been put in place was effective both from a scientific and regulatory perspective. It provided an informal, peer-review standard that is needed across federal agencies. Without such a system to safeguard against inadequate federal review, conflicts of interest between the agency an employee works for and the interests they are charged with regulating can arise.

The previous changes to the ESA were done with very little public feedback and without public hearings. Measures are needed to give the public an opportunity to voice its opinion; decisions on important environmental issues get made more by politicians, which sets an uneasy and disquieting precedent. Our previous letter stated our concerns with the limited amount of time that was allowed for public comment on these proposed amendments.

The intent and spirit of the ESA was to make decisions on our nation's natural resources based on sound science. We feel it is time to restore the integrity of this important law and to integrate public opinion into questions of environmental protection. Please act to overturn the actions of the Bush Administration and restore the interagency cooperation and consultation process to the Endangered Species Act. The resources that this policy governs are those of the citizens; they deserve nothing less than the best intent of the federal government in administering those resources.

Sincerely,

A handwritten signature in black ink that reads "Steven Ahlstedt". The signature is written in a cursive, slightly slanted style.

Steve Ahlstedt, President
Freshwater Mollusk Conservation Society

Cc: Secretary Ken Salazar,
US Dept of Interior

American Fisheries Society
North American Benthological Society
American Malacological Society