



EVERGLADES COALITION

Everglades Coalition Resolution Urging the U.S. Fish and Wildlife Service and National Marine Fisheries Service to Withdraw Proposals to Revise Endangered Species Act Regulations.

WHEREAS, the health and integrity of the Greater Everglades Ecosystem depend on the health and well-being of the native species of plants and animals that live there;

WHEREAS, the Greater Everglades Ecosystem is home to many endangered and threatened species including the Aboriginal prickly-apple, American crocodile, Audubon's crested caracara, Avon Park harebells, Bachman's warbler, Bartram's scrub-hairstreak butterfly, beach jacquemontia, beautiful pawpaw, Big Pine partridge pea, Blodgett's silverbush, blue-tailed mole skink, Britton's beargrass, Cape Sable seaside sparrow, Cape Sable thoroughwort, Carter's mustard, Carter's small-flowered flax, crenulate lead-plant, deltoid spurge, Eastern black rail, Everglades bully, Everglade snail kite, Florida bonamia, Florida bonneted bat, Florida brickell-bush, Florida bristle fern, Florida grasshopper sparrow, Florida leafwing butterfly, Florida panther, Florida pineland crabgrass, Florida perforate cladonia, Florida prairieclover, Florida scrub-jay, Florida semaphore cactus, Florida ziziphus, four-petal pawpaw, fragrant pricklyapple, Garber's spurge, Garrett's mint, green sea turtle, gulf sturgeon, hawksbill sea turtle, highlands scrub hypericum, Kemp's ridley sea turtle, Key tree cactus, Lakela's mint, leatherback sea turtle, Lewton's polygala, loggerhead sea turtle, Miami blue butterfly, Miami tiger beetle, Okeechobee gourd, papery whitlow-wort, pigeon wings, pineland sandmat, piping plover, pygmy fringe-tree, red knot, red-cockaded woodpecker, sand flax, sandlace, sand skink, Schaus swallowtail butterfly, scrub blazingstar, scrub buckwheat, scrub mint, scrub plum, short-leaved rosemary, small's milkpea, snakeroot, southeastern beach mouse, tiny polygala, wedge spurge, West Indian manatee, wireweed, and wood stork;

WHEREAS, the Endangered Species Act is a landmark environmental law that "represent[s] the most comprehensive legislation for the preservation of endangered species ever enacted by any nation";¹

WHEREAS, when enacting the Endangered Species Act, Congress set out to "provide a program for the conservation of . . . endangered species and threatened species" and "to

¹*Tenn. Valley Auth. v. Hill*, 437 U.S. 153, 180 (1978).



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provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved”;²

WHEREAS, the Endangered Species Act is one of the most effective and important environmental laws in the United States, responsible for preventing the extinction of 99% of the species under its care and guiding hundreds of species toward recovery;³

WHEREAS, in 2019 and 2020, the U.S. Fish and Wildlife Service and National Marine Fisheries Service (collectively, the Services) revised their Endangered Species Act regulations, significantly limiting their ability to provide the same historic level of protection that has helped save thousands of species from extinction;

WHEREAS, on June 21, 2023, the Services proposed rules to revise Endangered Species Act regulations and restore crucial protections for species;

WHEREAS, in August 2023, the Everglades Coalition passed a resolution recommending the strongest Endangered Species Act regulations to secure a future for endangered and threatened wildlife and plants in the Greater Everglades Ecosystem;

WHEREAS, in April 2024, the Services published final regulations restoring some—but not

² 16 U.S.C. § 1531(b).

³ Greenwald N, Suckling KF, Hartl B, A Mehrhoff L. Extinction and the U.S. Endangered Species Act. PeerJ. 2019 Apr 22;7:e6803. doi: 10.7717/peerj.6803. PMID: 31065461; PMCID: PMC6482936.



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all—of the protections necessary to conserve endangered and threatened species long-term;
WHEREAS, on November 21, 2025, the Services again published proposed regulatory revisions— most of which seek to reinstall the 2019 and 2020 regulations—that are contrary to the purpose and text of the Endangered Species Act and would again weaken endangered species conservation:

WHEREAS, while the Services admit that habitat destruction is the leading cause of species extinction, the proposed regulatory changes would weaken the listing process for endangered and threatened species and limit the designation of critical habitat;

WHEREAS, the proposed regulatory changes would introduce a cost-benefit analysis in protection decisions that conflicts with the Endangered Species Act’s statutory mandate and risks undermining science-driven decisionmaking that ensures long-term biodiversity protection;

WHEREAS, the proposed regulatory changes would give developers and polluters the power to block habitat protections by overriding the recommendations of expert scientists;

WHEREAS, the proposed regulatory changes would weaken the federal consultation process, which Congress designed to prevent harm to endangered animals and their habitats from federal agency activities;

WHEREAS, the proposed regulatory changes would eliminate automatic protections for threatened species under the Department of Interior’s care, hindering the ’ survival and recovery

The Everglades Coalition is a 501(c)3 alliance of local, state, and national conservation organizations dedicated to the full protection and restoration of America's Everglades.

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of species newly listed as threatened, complicating collaborative local conservation efforts, and creating an immense regulatory burden for a significantly reduced federal workforce;

WHEREAS, the proposed regulatory changes introduce a new, two-step process for critical habitat designation that adds complexity and uncertainty for agencies, landowners, and local governments without demonstrating any clear conservation benefit;

WHEREAS, removing any reference to recovery when delisting species ignores that recovery is the fundamental indicator of the impact of the Endangered Species Act and conservation measures;

WHEREAS, the 30-day comment period, spanning one major federal holiday and much of the weeks preceding two significant religious holidays, is unreasonably brief for a rule of this magnitude and inconsistent with the public participation requirements and spirit of the Administrative Procedure Act;

WHEREAS, biodiversity is under threat, with a million species facing extinction⁴, and now is the time to strengthen—not weaken—our nation’s most vital wildlife protections.

NOW, THEREFORE, BE IT RESOLVED, that The Everglades Coalition, nearly 60 organizations dedicated to protecting and restoring America’s Everglades with a 12.2-million-constituent network of followers, **strongly opposes the proposed changes to the Services’ Endangered**

⁴ See IPBES (2019). Summary for Policymakers of the Global Assessment Report on Biodiversity and Ecosystem Services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. IPBES secretariat, Bonn; Finn, C., Grattarola, F., & Pincheira-Donoso, D. (2023). More losers than winners: investigating Anthropocene defaunation through the diversity of population trends. Biological Reviews.



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Species Act regulations.

BE IT FURTHER RESOLVED, that the Everglades Coalition **urges the Services to withdraw the November 21, 2025 proposed regulations** to preserve the integrity and demonstrated effectiveness of the Endangered Species Act.

BE IT FURTHER RESOLVED, that the Everglades Coalition respectfully **requests an extension of the comment** period to no less than 60 days, given the wide-ranging implications of the proposed rule for species conservation, ecosystem health, public health, regulatory certainty, and local government responsibilities—and the extremely limited time for public review. An extended comment period is critical to allow state and local governments, Tribal Nations, conservation organizations, scientists, and the general public an opportunity to meaningfully analyze the proposed changes and provide informed, substantive feedback.

BE IT FURTHER RESOLVED, that the Everglades Coalition **remains steadfast in its commitment to defending science-based, legally sound, and ecologically effective policies** that ensure the continued survival of endangered and threatened species across the nation, including the Greater Everglades Ecosystem.

Mark Perry
Co-Chair

Lauren Jonaitis
Co-Chair

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