



October 23, 2012

Public Comments Processing
Attn: FWS–R9–ES–2011–0073
Division of Policy and Directives Management,
U.S. Fish and Wildlife Service,
4401 N. Fairfax Drive, MS 2042-PDM,
Arlington, VA 22203

Re: Comments by the Society for Conservation Biology on Proposed Revisions to the Regulations for Impact Analyses of Critical Habitat.

On behalf of the Society for Conservation Biology (SCB)¹ we offer the following comments on the proposed regulatory changes for economic analysis of critical habitat.² Section 4(b)(2) of the Endangered Species Act (ESA)³ requires U.S. Fish and Wildlife Service (FWS) and the National Marine Fisheries Service (NMFS) (collectively the “Services”) to consider the economic impacts, and any other relevant impacts, of specifying any particular area as critical habitat. The Services may exclude any area from critical habitat if they determine that the benefits of excluding an area as critical habitat outweigh the benefits of specifying such area as part of the critical habitat, unless the exclusion of an area will result in the extinction of the species concerned.⁴ The Services have proposed to modify the regulatory framework that guides the impacts analysis and balancing inquiry to improve the transparency of this process and the ability of the public to make meaningful contributions to this process.

SCB supports the general goal of increasing transparency and the public comment process where appropriate in the implementation of the Endangered Species Act, and supports the Services’ goal in this instance as well. The regulatory proposal offered by the Services would provide several significant improvements in the existing regulatory framework, notably the formal adoption of an incremental impacts analysis, as well as the decision to allow both economic impacts and benefits to be described quantitatively or qualitatively. We are also encouraged by language in the rule that affirms that the consideration of economic impacts will “neither affect nor delay the listing of species” and “must be kept analytically distinct from, and have no effect on the outcome, [or] timing of listing determinations.”⁵ However, several important changes need to be made in order to guarantee that the revised regulatory framework does in fact result in a more transparent process.

¹ SCB is an international professional organization whose mission is to advance the science and practice of conserving the Earth’s biological diversity, support dissemination of conservation science, and increase application of science to management and policy. The Society’s 5,000 members include resource managers, educators, students, government and private conservation workers in over 140 countries.

² *Revisions to the Regulations for Impact Analyses of Critical Habitat* (hereafter CRITICAL HABITAT PROPOSAL), 77 Fed. Reg. 51,503 (Aug. 24, 2012).

³ 16 U.S.C. § 1531 *et seq.*

⁴ *Revised Critical Habitat for the Northern Spotted Owl*, 77 Fed. Reg. 14,062 (Mar. 8, 2012).

⁵ CRITICAL HABITAT PROPOSAL, 77 Fed. Reg. at 51,506.

First, in situations where the FWS or NMFS does not possess the required data to conduct a full economic analysis at the time it is making an initial listing determination, SCB recommends that the Services conduct a threshold analysis first. If the impacts of designation do not exceed the \$100 million threshold set by Executive Order 12866 or impact directly-regulated small entities,⁶ then the Services should be permitted to conclude that no further economic analysis is required.

Second, if the Services elect to exclude any areas from a critical habitat proposal, then the Services should make such a determination only at the final rulemaking stage. Requiring that such a decision can only occur at this point reduces the risk of improper political interference in the scientific aspects of designating critical habitat. As recently as 2006, improper political interference occurred within various aspects of the implementation of the ESA on issues that the law requires be based on the best available science.⁷

Finally, with respect to any balancing inquiry relating to the exclusion of critical habitat, SCB recommends that the rulemaking language make clear that any exclusion of critical habitat must be supported by the record. The changes we recommend will help the regulatory proposal better align with the statutory intent of the ESA and a 2008 legal opinion from the Department of Interior Solicitor's Office entitled *The Secretary's Authority to Exclude Areas from a Critical Habitat Designation under Section 4(b)(2) of the Endangered Species Act* (hereafter "Critical Habitat M-Opinion").⁸

I. Introduction to Critical Habitat and Economic Analysis under Section 4(b)(2).

In 1978, Congress amended the ESA to address "critical habitat," which until then was undefined under the Act. In the 1978 amendments, Congress defined the term "critical habitat" as those areas currently occupied by a threatened or endangered species in "which are found those physical or biological features (I) essential to the conservation of the species and (II) which may require special management considerations or protection" as well as areas outside the geographic area currently occupied by a species that "are essential for the conservation of the species."⁹ This definition guides the scientific inquiry that is used by the Services to identify areas that should be designated as critical habitat. However, the process of designating critical is not limited to just a mapping exercise of the physical and biological features. Congress also provided the Services with the *discretion* to exclude areas that are scientifically appropriate for designation of critical habitat based on economic, national security, and other relevant concerns. In Section 4(b)(2) of the ESA, which was also added in 1978, Congress set forth the process by which FWS designates critical habitat:

⁶ Regulatory Flexibility Act, 5 U.S.C. § 601 *et seq.*

⁷ US Dept. of Interior Inspector General. 2008. *Report of Investigation: The Endangered Species Act and the Conflict between Science and Policy*, Dec. 15, 2008.

⁸ US Dept. of Interior. 2008 *The Secretary's Authority to Exclude Areas from a Critical Habitat Designation under Section 4(b)(2) of the Endangered Species Act* (CRITICAL HABITAT M-OPINION) M-37016 (Oct. 3, 2008).

⁹ 16 U.S.C. § 1532(5)(A)(i)-(ii).

The Secretary shall designate critical habitat, and make revisions thereto...on the basis of the best scientific data available and after taking into consideration the economic impact, and any other relevant impact, of specifying any particular area as critical habitat. The Secretary may exclude any area from critical habitat if he determines that the benefits of such exclusion outweigh the benefits of specifying such area as part of the critical habitat, unless he determines, based on the best scientific and commercial data available, that the failure to designate such area as critical habitat will result in the extinction of the species concerned.¹⁰

In 1984, the Services published regulations to guide this impact assessment and the balancing inquiry for deciding whether to exclude areas from a final critical habitat proposal. These regulations are found at 50 C.F.R. §424.19:

The Secretary shall identify any significant activities that would either affect an area considered for designation as critical habitat or be likely to be affected by the designation, and shall, *after proposing designation of such an area*, consider the probable economic and other impacts of the designation upon proposed or ongoing activities. The Secretary may exclude any portion of such an area from the critical habitat if the benefits of such exclusion outweigh the benefits of specifying the area as part of the critical habitat. The Secretary shall not exclude any such area if, based on the best scientific and commercial data available, he determines that the failure to designate that area as critical habitat will result in the extinction of the species concerned.

The current regulatory language affirms the implicit temporal sequence contained in Section 4(b)(2) of the ESA. As a first step, the Services must conduct a science-based inquiry to identify critical habitat, and at that stage identify possible economic impacts of the designation. Once that is completed, the Services have the discretion to analyze the economic impacts, economic benefits, additional impacts, and additional benefits, and may then decide whether or not an exclusion of an area from critical habitat may be warranted. In implementing this regulation, it has been standard practice for the Services to publish a proposed critical habitat rule that identifies areas that contain the physical and biological features essential for the conservation of a particular species based on the best available science. The proposed rule usually also contains a brief list of activities that might be affected by the designation of critical habitat. For example, on February 28th, 2012, the Services published a draft critical habitat proposal for the Northern Spotted Owl (*Strix occidentalis caurina*).¹¹ The proposal contained extensive discussions of the physical and biological features essential to the conservation of the species, provided maps identifying where such critical habitat was located, and a fairly comprehensive discussion of the activities that might be affected by such a designation. The publication of the proposed rule opened the public comment period on the critical habitat proposal itself.

After a proposed critical habitat rule is published, the Services undertake a more detailed economic analysis of the proposed rule. Once the economic analysis is complete, the Services

¹⁰ 16 U.S.C. § 1533(b)(2) (emphasis added).

¹¹ *Revised Critical Habitat for the Northern Spotted Owl*, 77 Fed. Reg. 14,062 (Mar. 8, 2012).

then provide the public an opportunity to comment on the economic analysis report. For the Northern Spotted Owl critical habitat, a 235-page economic analysis report was published on May 29th, 2012 that discussed the economic impacts of designating critical habitat. Because of the complexity of the report and the critical habitat proposal, the FWS extended the public comment period from June 6th, 2012 to July 6th, 2012, providing the public with over 30 days to comment on the economic analysis. Once all comments are received regarding the economic analysis and the critical habitat proposal itself, the Services then decide at the final rulemaking stage whether to exclude particular areas from the critical habitat designation based on economic or other concerns. For the Northern Spotted Owl, once the FWS reviews all the public comments regarding the critical habitat proposal itself and the accompanying economic analysis, it will publish a final critical habitat proposal that may contain exclusions based on the balancing of economic impacts and benefits of the designation.

On February 28, 2012, President Obama issued a Presidential Memorandum relating to the critical habitat designation of the Northern Spotted Owl,¹² which included a directive to the Secretary of the Interior to modify 50 C.F.R. § 424.19 in order to require the Services to publish the economic analysis of a proposed critical habitat designation at the same time the draft rule for such critical habitat is published in the Federal Register. And, on August 24th, 2012, the Services proposed the following changes to 50 C.F.R. § 424.19 *Impact analysis and exclusions from critical habitat*:

- (a) At the time of publication of a proposed rule to designate critical habitat, the Secretary will make available for public comment the draft economic analysis of the designation. The draft economic analysis will be summarized in the Federal Register notice of the proposed designation of critical habitat. The Secretary will, to the maximum extent practicable, when proposing and finalizing designation of critical habitat, briefly describe and evaluate in the Federal Register notice any significant activities that are known to have the potential to affect an area considered for designation as critical habitat or be likely to be affected by the designation.
- (b) Prior to finalizing the designation of critical habitat, the Secretary will consider the probable economic, national security, and other relevant impacts of the designation upon proposed or ongoing activities. The Secretary will consider impacts at a scale that the Secretary determines to be appropriate, and will compare the impacts with and without the designation. Impacts may be qualitatively or quantitatively described.
- (c) The Secretary has discretion to exclude any particular area from the critical habitat upon a determination that the benefits of such exclusion outweigh the benefits of specifying the particular area as part of the critical habitat. In identifying those benefits, in addition to the impacts considered pursuant to paragraph (b) of this section, the Secretary may consider and assign the weight to any benefits relevant to the designation of critical habitat. The Secretary, however, will not exclude any particular area if, based on the best scientific and commercial data available, the Secretary determines that the failure to designate that area as critical habitat will result in the extinction of the species concerned.

¹² The White House. 2012. Memorandum for the Secretary of Interior. *Proposed Revised Habitat for the Spotted Owl: Minimizing Regulatory Burdens*. 77 Fed. Reg. 12,985 (Mar. 5, 2012).

Had these regulations been in place at the time of the Northern Spotted Owl critical habitat proposal, the FWS would have been required to publish its 235-page economic analysis at the same time as the critical habitat proposal itself on February 28, 2012. This would have provided the public with 90 days to comment on the economic analysis. More time to provide meaningful public input in this process is a laudable goal. However, it may not always be a realistic goal in all instances, and moving the economic analysis forward temporally could have several unanticipated consequences, including the opportunity for improper political interference in the process of identifying and designating critical habitat. It is actually difficult to conceive how the FWS could have been able to publish this analysis at the time of the proposed rule without actually delaying the publication of the proposed rule itself. Delays in the publication of critical habitat proposals could have significant consequences for the effectiveness of the implementation of the ESA, including the loss or degradation of existing habitat and further imperilment of the species. Accordingly, SCB recommends the following changes to the Services draft regulatory proposal (noted by bolded, italicized, underlined text).

II. **Proposed 50 C.F.R. § 424.19(a) Should be Revised as Follows:**

To the maximum extent practicable, at the time of publication of a proposed rule to designate critical habitat, the Secretary will make available for public comment the draft economic analysis of the designation. The draft economic analysis will be summarized in the Federal Register notice of the proposed designation of critical habitat **or as soon thereafter as it is available**. The Secretary will, to the maximum extent practicable, when proposing and finalizing designation of critical habitat, briefly describe and evaluate in the Federal Register notice any significant activities that are known to have the potential to affect an area considered for designation as critical habitat or be likely to be affected by the designation.

A. Explanation of SCB's Recommended Changes

It is important for the Services to acknowledge that the ESA has a statutory preference that the listing of a species as threatened or endangered *and* the designation of critical habitat for such species *occur at the same time in the same rulemaking*.¹³ SCB's primary concern with the proposed change to the critical habitat regulations is that there may arise situations where the FWS or NMFS does not possess the required data to conduct an economic analysis at the time it is making an initial listing determination. If the proposed regulatory language were to be finalized in its current form, it may force the Services to make one of several equally inappropriate choices: (1) delay the listing decision while economic data is collected, (2) split the listing and critical habitat rulemaking and delay the critical habitat component while the Services collect economic data, or (3) attempt to obtain economic data during the listing process in an accelerated manner that may violate the basic principles of notice and comment under the Administrative Procedures Act.

¹³ See 16 U.S.C. § 1533(b)(6)(C) ("A final regulation designating critical habitat of an endangered species or a threatened species shall be published concurrently with the final regulation implementing the determination that such species is endangered or threatened, unless the Secretary deems that....critical habitat of such species is not then determinable.")

The Services state that the proposed regulatory changes will “neither affect nor delay the listing of species.”¹⁴ This statement implies that in situations where the economic analysis will take additional time, the Services will choose to delay the designation of critical habitat. The ESA does provide the Services with the option of taking an additional year to designate critical habitat when critical habitat is not determinable, but again, this is not the preferred approach (nor is it clear whether a “not determinable” finding would be appropriate in situations where the economic analysis is not complete, but the critical habitat itself can be determined. But more importantly, from a conservation perspective, such delay is not preferable because the scientific literature illustrates that when threatened and endangered species have designated critical habitat, such species generally are twice as likely to have an improving population trend as those species that do not possess critical habitat.¹⁵ SCB notes that in recent years, the FWS has made significant improvements in its internal listing processes and generally has been designating critical habitat at the time a species is listed as threatened or endangered.¹⁶ SCB is concerned that this regulatory change would reduce the frequency at which the FWS is able to designate critical habitat at the time of listing. SCB also notes that the NMFS rarely, if ever, designates critical habitat at the same time it lists species as threatened or endangered.¹⁷ This practice of delaying designations should not be encouraged and, rather NMFS should attempt to designate critical habitat at the time it lists species under the ESA.

If this regulatory change is not to delay listing, then the Services will need to delay the designation of critical habitat. A delay for one year is not preferred, but if that were the only consequence of this regulatory change, it would substantially weaken the listing process under the ESA. However, delaying the designating of critical habitat may not address another structural problem—namely, what should the Services do if they do not possess the data needed to conduct an economic analysis at the time they are designating critical habitat? Putting lines on a map delineating possible critical habitat units would seem to be a necessary prerequisite to determining the economic impacts of their designation as critical habitat. If the FWS or NMFS already possesses data on economic impacts at the time that lines are being put on a map, then it would be feasible for the agency to do an economic analysis in house (or potentially with a contractor). But, where these data do not exist, there is a real procedural concern. The FWS or NMFS would have to share the pre-decisional draft map (either with other agencies in the Federal government, a contractor that will conduct the economic analysis, and/or some members of the public/regulated community) prior to releasing the map to the general public in the Federal Register.

¹⁴ CRITICAL HABITAT PROPOSAL, 77 Fed. Reg. at 51,506

¹⁵ Taylor, M.F., K.F. Suckling, J.J. Rachlinski. 2005. The Effectiveness of the Endangered Species Act: A Quantitative Analysis, *BioScience* 55:360-367.

¹⁶ See, e.g., *Listing Species on Oahu as Endangered and Designating Critical Habitat for 124 Species*, 76 Fed. Reg. 46,362 (Aug. 2, 2011); *Determination of Endangered Species Status for Coquí Llanero Throughout Its Range and Designation of Critical Habitat*, 77 Fed. Reg. 60,778 Oct. 4, 2012; *Endangered Status for the Acuña Cactus and the Fickeisen Plains Cactus and Designation of Critical Habitat*, 77 Fed. Reg. 60,510 (Oct. 3, 2012); *Endangered Status for Grotto Sculpin and Designation of Critical Habitat*, 77 Fed. Reg. 59,488 (Sept. 27, 2012). t

¹⁷ See, e.g., *Proposed Rulemaking to Revise Critical Habitat for Hawaiian Monk Seals*, 76 Fed. Reg. 32,026 (Jun. 2, 2011).

Releasing a pre-decisional version of the critical habitat designation could violate the public commenting process under the Administrative Procedure Act if the FWS or NMFS were to release a pre-decisional document to a select group, while the rest of the public would be unable to view or comment on the proposal until later. The release of a pre-decisional map (especially if it is released to the regulated community) also increases the risk of improper political interference in the critical habitat designation process. If it turns out that a particular pre-decisional critical habitat map identifies several areas as critical habitat that could have significant economic impacts, the Services may receive additional pressure to excise those areas from the draft critical habitat proposal prior to its general release to the public. At a minimum, SCB recommends that the final rulemaking proposal identify a process wherein the Services will obtain economic data in a manner that does not violate the APA or result in the release of pre-decisional drafts to selected portions of the public.

Even with the inclusion of the language “to the maximum extent practicable” the Services may still have considerable difficulty completing analysis by the time the draft rulemaking is available. Thus, we believe that it may be necessary for the Services to limit their economic analysis to a threshold analysis at the time the proposed rulemaking is published, with subsequent, detailed analysis coming after the draft proposal is available for public comment (much like the current process). A threshold analysis would be appropriate, because in general, critical habitat determinations do not appear to trigger extensive analysis under either the Regulatory Flexibility Act or Executive Order 12866. Under the Regulatory Flexibility Act, economic analyses are only required for “directly regulated” small entities.¹⁸ Since critical habitat designations only directly impact federal agencies through Section 7 consultations, there are very few directly regulated small business entities that are affected by a critical habitat designation. Likewise, Executive Order 12866 only requires a detailed analysis of regulations costing more than \$100 million/year. To SCB’s knowledge almost none of the previously completed critical habitat economic analyses have ever reached this threshold level. Therefore, SCB recommends that, given the limited time to conduct an economic analysis, the Services conduct a threshold analysis first, and if the impacts appear not to exceed \$100 million or impact directly regulated small entities, then the Services should be permitted to conclude that no further economic analysis is required.

III. Proposed 50 C.F.R. § 424.19(c) Should be Revised as Follows:

The Secretary has discretion to exclude any particular area from the *final* critical habitat *designation* upon a determination, *supported by the record*, that the benefits of such exclusion outweigh the benefits of specifying the particular area as part of the critical habitat. In identifying those benefits, in addition to the impacts considered pursuant to paragraph (b) of this section, the Secretary may consider and assign the weight to any benefits relevant to the designation of critical habitat. The Secretary, however, will not exclude any particular area if, based on the best scientific and commercial data available, the Secretary determines that the

¹⁸ Regulatory Flexibility Act, 5 U.S.C. § 601 *et seq.*; *Mid-Tex Elec. Coop v. FERC*, 773 F.2d 327 (D.C. Cir. 1985); *Cement Kiln Recycling Coalition et. al. v. EPA*, 255 F.3d 855 (2001).

failure to designate that area as critical habitat will result in the extinction of the species concerned.

A. Explanation of SCB's Recommended Changes

It is critically important that if the Services elect to exclude any areas from a critical habitat proposal, that this decision occur *only* at the final rulemaking stage. SCB is deeply concerned that if this limitation is not made explicit in the regulatory language, then there is the possibility that exclusions could occur at any time during the rulemaking process, even potentially before the publication of a proposed critical habitat rule. By moving forward temporally the economic analysis, there is a risk that the Services could excise an area, which is identified as having a significant economic impact or being politically contentious, prior to the publication of even the draft critical habitat proposal. Such a decision would not represent the balancing inquiry envisioned under Section 4(b)(2) because there would be no opportunity for the public to provide input on the benefits of including such an area within the critical habitat proposal.

If the Services were to exclude areas prior to the publication of the proposed rulemaking, it would be very difficult for the public or scientific community to ascertain why such an area was excised because there may not even be documentation in the administrative record that illustrates the decision-making process used by the Services in such a scenario. While this scenario may be unlikely, it was only six years ago that evidence came to the public's attention about the extent of improper political interference by political appointees from the previous administration in FWS decisions affecting threatened and endangered species.¹⁹ The proposed regulatory language does not establish a sufficient firewall to prevent such political interference from occurring in the future. But, a simple requirement for the Services to limit the balancing inquiry to the final rulemaking stage would help address this problem.

In addition, limiting the balancing inquiry to the final rulemaking would have the benefit of making the public's comments regarding a critical habitat proposal more meaningful. For example, when NMFS designates critical habitat, it usually already possesses the economic data needed to determine the impacts of a possible critical habitat proposal because the primary impacts of designating critical habitat in the marine environment are typically related to federally-managed fisheries. Therefore, NMFS is able to do its 4(b)(2) analysis at the time the proposed critical habitat rule is released. In the proposed rule, NMFS usually has identified areas for proposed exclusion AND has made a preliminary decision as to whether those areas should be excluded or not because NMFS has already done the balancing contemplated by the ESA.²⁰ If the goal of the Services' regulatory change is to increase transparency and public participation, then the NMFS approach would appear to meet the first goal of transparency, but not necessarily the second goal of increased public participation because NMFS has already completed its balancing inquiry. SCB believes that the best approach would be to defer making any balancing decision, preliminary or otherwise, until the completion of the public comment

¹⁹ US Dept. of Interior Inspector General. 2008. *Report of Investigation: The Endangered Species Act and the Conflict between Science and Policy*, Dec. 15, 2008.

²⁰ See, e.g., *Proposed Critical Habitat for the Gulf of Maine Distinct Population Segment of Atlantic Salmon*, 73 Fed. Reg. 51,747 (Sept. 5, 2008).

process. SCB also believes that this approach would also be the most consistent with the Critical Habitat M-Opinion, which states:

The Secretary may properly find any of these considerations to be relevant impacts under section 4(b)(2). However, the defensibility of exclusions based on these considerations may depend upon a number of issues relating to the plan or relationship, such as: *the degree to which the record supports a conclusion that a critical habitat designation would impair realization of benefits expected from the plan; the extent of public participation; the rigor of agency review and required determinations.*²¹

Finally, with respect to any balancing inquiry relating to the exclusion of critical habitat, SCB recommends that the rulemaking language make clear that exclusion of critical habitat must be supported by the record. Language making this requirement explicit should be included in the final language for 50 C.F.R § 424.19. To ensure accountability and transparency, the Services must clearly explain each of the choices they have made in deciding whether to exclude an area from a critical habitat designation. The Services should clearly explain the basis for their selection of the scale at which they evaluate the impacts and benefits of critical habitat.²² The Services must identify the benefits of excluding the area under consideration and they must also identify the benefits of including the area as critical habitat. The benefits of inclusion will usually relate principally to the conservation of the species, however they may also relate to indirect benefits such as preserving and restoring ecosystem services, improvements to air or water quality, enhancing recreational and hunting opportunities, and pollination services.²³ And if the benefits of designating critical habitat are primarily biological (non-economic), while the benefits of exclusion are primarily economic, the Services must explain how it compared these two qualitatively disparate types of values. The Services must evaluate the benefits of exclusion or inclusion in “an even-handed and logically consistent way.”²⁴ Finally, as the Critical Habitat M-Opinion states “as the scope of the exclusions contemplated increases, the benefit of inclusion may increase in a more-than-linear manner, requiring a proportionately greater benefit of exclusion to outweigh it.” By requiring in the regulatory language itself that any exclusion made by the Services be supported by the record, the likelihood of an exclusion being made for improper political purposes decreases. This serves the long-term goals of making the implementation of the ESA more efficient and the Services’ decision-making more scientifically defensible.

CONCLUSION

SCB supports the general goal of increasing transparency and improving the economic analyses conducted by the Services with respect to critical habitat designations. SCB supports the Services’ decision to adopt an incremental impacts analysis for critical habitat designation

²¹ CRITICAL HABITAT M-OPINION at 26.

²² CRITICAL HABITAT M-OPINION at 17.

²³ CRITICAL HABITAT M-OPINION at 23. *See also*, Comments by the Society for Conservation Biology’s North America Section Regarding the Economic Analysis of the Revised Critical Habitat for the Northern Spotted Owl, July 5, 2012 Available at: http://www.conbio.org/images/content_policy/2012-7-5_SCB_Spotted_Owl_Economic_Analysis_Comments.pdf

²⁴ *Center for Biological Diversity v. Bureau of Land Management*, 422 F. Supp. 2d 1115 (N.D. Cal. 2006).

and the decision to allow economic impacts and benefits to be described quantitatively or qualitatively. SCB believes that the changes recommended above will result in a more transparent process that is less vulnerable to improper political interference. Thank you for your consideration.

Sincerely,

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