EARTHJUSTICE

ALASKA CALIFORNIA FLORIDA MID-PACIFIC NORTHEAST NORTHERN ROCKIES
NORTHWEST ROCKY MOUNTAIN WASHINGTON, DC INTERNATIONAL

September 1, 2015

Via Certified U.S. Mail

Sally Jewell, Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Daniel M. Ashe, Director
U.S. Fish & Wildlife Service
1849 C Street, NW
Washington, DC 20240

Re: Notice of Intent to Sue for Violations of the Endangered Species Act Regarding "Not Warranted" Listing Decision for the Coastal Oregon and Northern Coastal California Population of Pacific Marten (*Martes caurina*)

Dear Secretary Jewell and Director Ashe:

On behalf of the Center for Biological Diversity ("the Center") and Environmental Protection Information Center ("EPIC"), we hereby provide notice that the U.S. Fish and Wildlife Service ("Service") is in violation of the Endangered Species Act ("ESA"), 16 U.S.C. §§ 1531-1544, and the Administrative Procedure Act ("APA"), 5 U.S.C. §§ 500-706, with regard to its determination that the coastal Oregon and northern coastal California population of Pacific marten (*Martes caurina)* does not warrant protection under the ESA. 80 Fed. Reg. 18,742-72 (April 7, 2015). The Center and EPIC also give notice that the Service's "Final Policy on Interpretation of the Phrase Significant Portion of Its Range" ("SPOR Policy"), 79 Fed. Reg. 37,578 (July 1, 2014), as applied to the "not-warranted" finding for the Pacific marten's coastal population, is inconsistent with the ESA and therefore illegal. This letter is provided pursuant to the sixty-day notice requirements of the citizen suit provision of the ESA, to the extent such notice is deemed necessary by a court. 16 U.S.C. § 1540(g)(2).

I. The Marten and the Listing Petition

Closely related to minks and fishers, martens are long, slender carnivores with fox-like faces and large triangular ears. Historically, martens were relatively common in old forests throughout North America. However, decades of logging, development, fur-trapping, road kill, secondary exposure to rodenticides, and other stressors have taken a heavy toll, and marten populations have declined precipitously nationwide.

On September 28, 2010, the Center and EPIC petitioned the Service to list the remnant population of martens that still inhabits the coastal forests of northern California and Oregon as

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"threatened" or "endangered" under the ESA. Due to some scientific uncertainty regarding the appropriate taxonomy of this marten population, the petition referred to the population as the subspecies *Martes americana humboldtensis*, the subspecies *Martes caurina humboldtensis*, or, in the alternative, as a distinct population segment ("DPS") of the species *Martes caurina*. Regardless of precise taxonomy, the Center and EPIC summarized and attached substantial scientific information demonstrating that martens in coastal Oregon and northern California are on the brink of extinction and warrant immediate federal protection under the ESA.

II. The Service's Initial Finding and Status Review

On January 12, 2012, the Service announced its "initial finding" under Section 4(b)(3)(A) of the ESA, 16 U.S.C. § 1540(b)(3)(A), that the Center and EPIC's listing petition presented substantial information indicating that the coastal Oregon and northern California population of martens may warrant listing under the ESA. 77 Fed. Reg. 1,900 (Jan. 12, 2012). In light of this initial finding, the Service began a comprehensive review of the marten's taxonomy and status.

The Service completed its scientific review in April 2015. Based on the best scientific and commercial data available, the Service's final "species report" concludes that there are only two small subpopulations of martens remaining on the Oregon coast, and just one tiny population, likely consisting of fewer than 100 individuals, on the north coast of California. The species report finds that these three remaining subpopulations collectively occupy less than 17 percent of the marten's historic range in coastal Oregon and northern California, and the report finds that each of the three extant coastal marten populations are likely functionally isolated from one another. Based on this and evidence of other threats to the marten's survival, including ongoing loss of habitat, climate change, secondary exposure to anticoagulant rodenticides, and trapping, the Service's overall assessment of the martens' continued viability in coastal Oregon and northern California can best be described as bleak.

III. The Service's Not Warranted Decision

On April 7, 2015, without further scientific review, the Service published its official "12-month" finding under Section 4(b)(3)(B) of the ESA, 16 U.S.C. § 1540(b)(3)(B). 80 Fed. Reg. 18,742 (Apr. 7, 2015). The 12-month finding determines that the martens inhabiting coastal Oregon and northern California qualify as a DPS and are therefore eligible for listing under the ESA. *Id.* at 18,746. The 12-month finding further determines that the DPS is absent throughout the vast majority of its historic range, and that just three small subpopulations remain. Despite overwhelming evidence in the administrative record that the DPS is critically imperiled, the 12-month finding nevertheless concludes that the DPS is not at risk of extinction throughout all of its range, and will not be so in the foreseeable future. *Id.* at 18,769. Applying the Service's SPOR Policy, the 12-month finding further concludes, contrary to the scientific evidence in the record, that the DPS is not threatened or endangered throughout even a significant portion of its range. *Id*. at 18,771.

IV. Legal Background

Under Section 4 of the ESA, the Secretary of Interior, acting through the Service, is tasked with determining whether any terrestrial "species" warrants listing as "threatened" or "endangered." 16 U.S.C. § 1533(a)(1). The term "species" is defined broadly by the statute to include "any subspecies of fish or wildlife or plants, and any distinct population segment of any species of vertebrate fish or wildlife which interbreeds when mature."[1] 16 U.S.C. § 1532(16). A species is considered "endangered" if it "is in danger of extinction throughout all or a significant portion of its range" and "threatened" if it "is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range." 16 U.S.C. § 1532(6), (20).

The ESA directs the Service to "determine whether any species is an endangered species or a threatened species because of any of the following factors:"

(A) the present or threatened destruction, modification, or curtailment of its habitat or range;
(B) overutilization for commercial, recreational, scientific, or educational purposes;
(C) disease or predation;
(D) the inadequacy of existing regulatory mechanisms; or
(E) other natural or manmade factors affecting its continued existence.

16 U.S.C. § 1533(a)(1). Notably, "[t]hese factors are listed in the disjunctive; any one or a combination can be sufficient for a finding that a particular species is endangered or threatened." *Federation of Fly Fishers v. Daley*, 131 F. Supp. 2d 1158, at 1164 (N.D. Cal. 2000). *See also Defenders of Wildlife v. Norton*, 258 F.3d 1136, 1137-38 (9th Cir. 2001) ("If the [Service] decides that . . . one or more of five statutorily defined factors demonstrates that a species is endangered or threatened, [it] must issue a proposed rule recommending that species for ESA protection.").

Section 4 further requires the Service to make its listing determinations "solely on the basis of the best scientific and commercial data available." 16 U.S.C. § 1533(b)(1)(A). "With [the] best available data standard, Congress required [the] agency to consider the scientific information presently available and intended to give the benefit of the doubt to the species." *Brower v. Evans*, 257 F.3d 1058, 1070 (9th Cir. 2001) (quoting *Conner v. Burford*, 848 F.2d 1441, 1454 (9th Cir. 1988)). Accordingly, even when a listing decision "is a close call," the Service must "err on the side of the species." *Endangered Species Act Oversight: Hearing on S. 321 Before the Senate Subcomm. on Envtl. Pollution of the Comm. on Env't & Pub. Works*, 97th Cong. 37 (1981) (remarks of Senator Chafee). In so doing, the agency gives effect to Congress'

[1] The ESA does not expressly define the term "distinct population segment." However, the Service adopted a policy in 1996 to guide its evaluation of whether a particular wildlife population qualifies as a DPS. *See* 61 Fed. Reg. 4,722 (Feb. 7, 1996). In short, the Service's DPS policy directs the agency to analyze the "discreteness of the population segment in relation to the remainder of the species to which it belongs" and the "significance of the population segment to the species to which it belongs." *Id*. at 4,725.

policy of "institutionalized caution," which "lies at the heart" of the ESA. *Tennessee Valley Auth. v. Hill*, 437 U.S. 153, 178, 194 (1978).

V. Violations of Law

As detailed above, listing decisions under the ESA must be made "solely on the basis of the best scientific and commercial data available," giving the benefit of any doubt to the species. 16 U.S.C. § 1533(b)(1)(A). More generally, in judicial review under the APA, agency actions are to be set aside if they are arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law. *See* 5 U.S.C. § 706(2). It is well settled that an "agency must examine the relevant data and articulate a satisfactory explanation for its action" that does not "run[] counter to the evidence before the agency" and that "include[s] a rational connection between the facts found and the choice made." *Motor Vehicle Mfrs. Ass'n v. State Farm Mut. Auto Ins. Co.*, 463 U.S. 29, 43 (1983) (internal quotation marks omitted).

As set forth below, the Service's determination that the coastal DPS of the Pacific marten does not warrant listing as a threatened or endangered species is not based on the best scientific and commercial data available, is arbitrary and capricious, and is otherwise not in accordance with law, in violation of the ESA and APA.

A. The Service Violated the ESA and APA When It Failed To List the Coastal DPS of the Pacific Marten as Threatened or Endangered Throughout All of Its Range.

The Service's determination that the coastal DPS of the Pacific marten is not threatened or endangered throughout all of its range is contrary to the best scientific and commercial data available and is arbitrary and capricious. In reaching its "not warranted" conclusion, the Service's 12-month finding relies on a number of claims that are directly contrary to the best available science, as set forth in the record and the Service's own species report. For example, while the Service's species report concludes that the three extant coastal populations are "functionally isolated from one another," *see* Species Report at 43, the 12-month finding states inexplicably, "we do not have evidence to suggest that the populations are likely entirely isolated from one another," *see* 80 Fed. Reg. at 18,764. Along the same lines, whereas the species report concludes that all three of the extant populations are "presumed to be in decline," Species Report at 40, the 12-month finding states without support that "there is no empirical evidence that any current populations . . . are in decline," *see* 80 Fed. Reg. at 18,764.

There are numerous other instances in which the Service's 12-month finding relies on claims that are unsupported by, or directly contrary to, the best scientific evidence in the administrative record, including the denial of threat factors in the 12-month finding that were identified as threat factors in the species report. Furthermore, far from giving the benefit of any scientific doubt to the species, as the ESA requires, at numerous junctures the Service's 12-month finding improperly characterizes the best scientific evidence regarding the marten's status as "uncertain," and then improperly relies on the purported uncertainty as a basis for concluding

that listing is not warranted. The Service's approach is directly contrary to the ESA. *See, e.g.*, *Defenders of Wildlife v. Babbitt*, 958 F. Supp. 670, 679 (D.D.C. 1997) ("The [ESA] contains no requirement that the evidence be conclusive in order for a species to be listed."). *See also Ctr. for Biological Diversity v. Lohn*, 296 F. Supp. 2d 1223, 1239 (W.D. Wash. 2003), *vacated as moot*, 483 F.3d 984 (9th Cir. 2007) ("To deny listing of a species simply because one scientific field has not caught up with the knowledge in other fields does not give the benefit of the doubt to the species and fails to meet the best available science requirements.").

In the end, it is apparent that the Service's 12-month finding is not based "solely on the basis of the best scientific and commercial data available," but rather is arbitrary and capricious, in violation of the ESA and APA.

B. The Service Unlawfully Concluded That Coastal DPS of the Pacific Marten Is Not Threatened or Endangered Throughout a Significant Portion of Its Range.

Even if a species is not threatened or endangered across its entire range, it still must be listed under the ESA if it is threatened or endangered throughout a "significant portion of its range." *See* 16 U.S.C. § 1532(6), (20). Courts have made clear that the determination of whether a species is threatened or endangered throughout a significant portion of its range cannot be conflated with the question of whether it is threatened or endangered throughout its entire range. *See, e.g.*, *Defenders of Wildlife*, 258 F.3d at 1145. Moreover, the agency must consider both current and historical habitat in making this determination. *Id.; WildEarth Guardians v. Salazar*, 741 F. Supp. 2d 89, 98 (D.D.C. 2010).

The Service's determination that coastal DPS of the Pacific marten is not threatened throughout at least a significant portion of its range is unlawful for several reasons. First, the Service's determination was based on a flawed interpretation of the ESA that is inconsistent with federal caselaw construing the phrase "significant portion of its range." *See, e.g., Defenders of Wildlife*, 258 F.3d at 1141. For example, the Service's 12-month finding improperly and summarily concludes that the Pacific marten's coastal DPS is not threatened or endangered throughout a significant portion of its range on the grounds that the many stressors impacting the species are "relatively consistent across its range." 80 Fed. Reg. at 18,771. Not only is the Service's determination in this regard contrary to the best scientific and commercial information available, arbitrary, and capricious, but—even if true—the purported "uniformity" of stressors is not a legal or sufficient basis for concluding that a species is not threatened or endangered throughout a significant portion of its range.

Second, the Service wholly failed to consider the substantial loss of historic marten habitat in making its determination as to whether martens are threatened or endangered throughout a significant portion of its range. *See, e.g., WildEarth Guardians*, 741 F. Supp. 2d at 98 (historical habitat must be considered as part of analysis of whether a species is endangered or threatened in a "significant portion of its range"). The best scientific information available, as described in the Service's own species report, indicates that the coastal DPS is already extinct

throughout *85 percent* of its historic range in coastal Oregon, and over *95 percent* of its historic range in coastal northern California. *See* Species Report at 99, 29. The Service's 12-month finding fails to consider whether the DPS is threatened or endangered throughout at least a significant portion of its range as a result of this substantial loss of historic habitat.

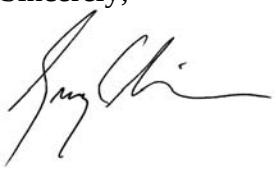
In reaching its determination that the Pacific marten's coastal DPS is not threatened or endangered throughout a significant portion of its range, the Service applied its SPOR Policy. *See* 80 Fed. Reg. 18,769 (citing 79 Fed. Reg. 37,578 (July 1, 2014)). However, the Service's SPOR Policy, as applied to the agency's "not warranted" finding for the Pacific marten's coastal DPS, violates the ESA. The Center and EPIC have detailed previously the numerous ways in which the Service's SPOR Policy is inconsistent with the ESA and caselaw interpreting the phrase "significant portion of the range." *See, e.g.*, Attachment A hereto (March 8, 2012 Comments on Service's Draft SPOR Policy). The Center and EPIC incorporate their prior comments herein. Here, the Service's application of its SPOR Policy to the Pacific marten's coastal DPS resulted in violations of the ESA. For example, the Service improperly excluded the DPS' historic habitat from its analysis. *See* 80 Fed. Reg. 18,770 ("[T]he range of a species is considered to be the general geographical area within which that species can be found at the time the Service . . . makes any particular status determination.") Consistent with the plain language of the ESA, however, federal courts have made clear that the Service "must at least explain [the] conclusion that the area in which the species can no longer live is not a significant portion of its range." *Defenders of Wildlife*, 258 F.3d at 1141.

In short, the Service's conclusion that that the coastal DPS of the Pacific marten is not threatened or endangered throughout at least a significant portion of its range is contrary to the best scientific and commercial data available and is arbitrary and capricious, in violation of the ESA and APA.

IV. Conclusion

We intend to pursue legal action in federal court to challenge the Service's "not warranted" listing decision for the coastal Oregon and northern coastal California population of Pacific marten as well as the Service's SPOR Policy, as both violate the ESA and the APA. Should you wish to discuss this matter, or if you believe any of the foregoing is in error, please do not hesitate to contact us.

Sincerely,



Gregory C. Loarie, Staff Attorney
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Encl. (Attachment A: March 8, 2012 Comments on Service's Draft SPOR Policy)

Attachment A

March 8, 2012

TO: Tina Campbell, Chief
Division of Policy and Directives Management
U.S. Fish and Wildlife Service
4401 North Fairfax Drive, MS 2042
Arlington, VA 22203
Attn: FWS–R9–ES–2011–0031

RE: Comments on a draft policy on interpretation of the phrase "significant portion of its range" in the Endangered Species Act's definitions of "endangered species" and "threatened species."

Dear Ms. Campbell:

On behalf of our millions of members and supporters who care deeply about imperiled wildlife that depend on the nation's forests, deserts, grasslands, oceans and other ecosystems, we write to express our concerns with the draft policy on interpretation of the phrase "significant portion of its range" ("SPOIR") proposed by U.S. Fish and Wildlife Service (FWS) and National Marine Fisheries Service (NMFS). The Endangered Species Act defines an endangered species as "any species which is in danger of extinction throughout all or a significant portion of its range" and a threatened species as "any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range." The language of these definitions, the legislative history, recent case law, and the draft policy itself all make clear that a species need not be at risk of worldwide extinction to qualify for Endangered Species Act protection. Rather, as noted in the draft policy, a species can qualify as an endangered species in two ways: if it is in danger of extinction "throughout all of its range," or if it is in danger of extinction "in a significant portion of its range."[1] In enacting this provision, Congress intended to provide a means to protect species before they are on the brink of extinction, which is of paramount importance to species conservation.

The previous policy developed by the Solicitor of the Department of the Interior ran afoul of the ESA's statutory language, and we supported its withdrawal.[2] We have serious concerns, however, about provisions of the draft policy—specifically: (1) the proposed definition of "significant," which specifies that a portion of range can be considered significant only if loss of the species from that portion would threaten the species as a whole with extinction, and (2) the determination that lost historic range cannot qualify as a significant portion of range.

The draft policy specifies that a "portion of the range of a species is 'significant' if its contribution to the viability of the species is so important that without that portion, the species

[1] U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration. 2011. Draft Policy on Interpretation of the Phrase ''Significant Portion of Its Range'' in the Endangered Species Act's Definitions of "Endangered Species" and "Threatened Species." December 9, 2012, 76 Fed. Reg. 76,991.
[2] U.S. Department of the Interior, Office of the Solicitor. 2007. The Meaning of "In Danger of Extinction Throughout All or a Significant Portion of its Range." Memorandum M-37013, March 16, 2007.

would be in danger of extinction."[3] This definition does not provide a meaningful distinction between when a species is endangered or threatened in a SPOIR and when a species is imperiled throughout all its range, and will severely limit protection for species that are imperiled in significant portions of their ranges. Indeed, this definition of significance has already formed the basis for denying protection to the cactus ferruginous pygmy-owl despite the fact that it is indisputably imperiled in the Sonoran Desert, which FWS itself determined is important to the representation, redundancy and resiliency of the species.[4]

Moreover, we believe this draft policy definition does not truly solve the redundancy problem identified by the Ninth Circuit Court of Appeals in Defenders of Wildlife v. Norton, 258 F.3d 1136 (9th Cir. 2001). In Defenders, the appellate court held that "[i]f … the effect of extinction throughout 'a significant portion of its range' is the threat of extinction everywhere, then the threat of extinction throughout 'a significant portion of its range' is equivalent to the threat of extinction throughout *all* its range." Id. at 1141. Although worded differently, it seems that, in effect, the Services have again collapsed the two paths to species' protection mandated by Congress. See 76 Fed. Reg. at 77,003 (conceding that, "[u]nder most circumstances, … the outcomes of [the agencies'] status determinations with or without the draft policy would be the same").

The draft policy emphasizes "the biological importance of the portion to the conservation of the species as the measure" for determining when a portion can be considered significant, using "the concepts of redundancy, resiliency, and representation."[5] We support using these concepts to evaluate the significance of portions of range, but the threshold for determining this importance cannot be set as high as the risk of extinction to the species as a whole. Instead, portions of range that meaningfully contribute to the species in terms of its redundancy, resiliency, and representation should be considered significant. Please consider this alternative approach.

The draft policy further specifies that when considering whether a species is endangered in a SPOIR, the range that will be considered is "the general geographical area within which that species can be found at the time FWS or NMFS makes any particular status determination," and more directly that lost historical range "cannot constitute a significant portion of a species' range."[6] Under this policy, past losses of species are effectively ignored unless they compromise the viability of the species in its current range, making determinations of the need to protect species arbitrarily dependent on when the agencies consider the status of a species. This approach leads to a temporally shifting baseline, which has long been recognized as problematic by conservation scientists.[7] We do not contend that lost historic range automatically means a

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[3] 76 Fed. Reg. at 77,002.

[4] U.S. Fish and Wildlife Service, Endangered and Threatened Wildlife and Plants; 12-Month Finding on a Petition To List the Cactus Ferruginous Pygmy-Owl as Threatened or Endangered With Critical Habitat, October 5, 2011, 76 Federal Register 61856.

[5] 76 Fed. Reg. at 76,993.

[6] 76 Fed. Reg. at 77,002.

[7] See Dayton, P. K., M. J. Tegner, P. B. Edwards, and K. L. Riser. 1998. Sliding baselines, ghosts, and reduced expectations in kelp forest communities. Ecological Applications **8:**309–322; Waples, R. S., P. B. Adams, J. Bohnsack, and B. L. Taylor. 2008. Legal viability, societal values, and SPOIR: response to D'Elia et al. Conservation Biology **22:**1075–1077; and Greenwald, D.N. 2009. Effects on Species' Conservation of

species must be protected under the Endangered Species Act, but rather that, as with current range, the agencies should analyze whether areas of lost range are needed to ensure redundancy, resiliency, and representation of the species.

We are further concerned that the proposed SPOIR policy is inconsistent with the urgent need to ensure that species have sufficient habitat and adaptability to weather changes in their environment ongoing and predicted under climate change, which will undoubtedly have consequences on the range of imperiled species. Therefore, it is essential that a SPOIR not be restrictive, but rather allow for broad protections to the full range of habitats occupied by species, some of which will undoubtedly provide climate refugia and thereby ensure their survival.

As acknowledged in the draft policy, protecting species because they are endangered in significant portions of their ranges "may lead to application of the protections of the Act in areas in which a species is not currently endangered or threatened with extinction."[8] To address this issue while at the same time avoiding exposing more species to the risk of extinction, we agree with the Services that they have the discretion "to implement the Act, where possible, to avoid or minimize expending resources on actions that either do not address threats that led to the species warranting listing or do not advance recovery of the species."[9]

Sincerely,

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Federal Policy Director
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Reinterpreting the Phrase "Significant Portion of its Range" in the U.S. Endangered Species Act. Conservation Biology **23**:1374-1377.

[8] 76 Fed. Reg. at 76,992.

[9] Id.

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Brent Plater
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Wild Equity Institute

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Director
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Josh Laughlin
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