

Congress of the United States
House of Representatives
Washington, DC 20515-0902

March 1, 2018

Honorable Ryan Zinke
Secretary
U.S. Department of the Interior
1849 C Street NW, Washington, DC 20240

Dear Secretary Zinke,

I am writing on behalf of the residents of Florida's Second Congressional District to relay our concern with the proposed addition of the Panama City crayfish to the List of Threatened and Endangered Wildlife under the Endangered Species Act of 1973 (ESA), as amended.

Florida's wildlife and wilderness draw millions of visitors from the around the world, and provide economic, aesthetic and recreational benefits to all Floridians. For this reason, local communities and state authorities work in concert to provide robust protections for all native species and their habitats, including the Panama City crayfish.

Currently, the Panama City crayfish is protected as a State Species of Special Concern by Florida's Endangered and Threatened Species Rule, which means take, possession, transport or sale of the species is prohibited and permitting decisions account for the survival potential of the species. The status of listed species is reviewed in regular intervals, and species management strategies and interventions are tailored based on the best available scientific information. Floridians implement this regulatory regime for the express purpose of preventing species from being threatened to such an extent that they become regulated and managed under the ESA. Moreover, in the case of the Panama City crayfish, Florida's wildlife and habitat conservation is adequate for ensuring the survival of the species.

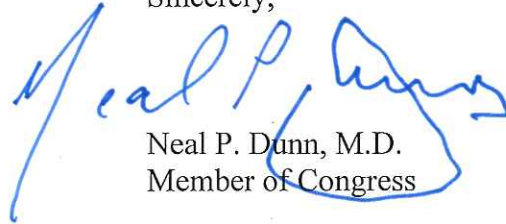
In accordance with a 2011 legal settlement, the U.S. Fish and Wildlife Service was required to produce a listing determination for the Panama City crayfish by December 29, 2017. Working under threat of further litigation, the U.S. Fish and Wildlife Service (USFWS) hastily proposed a rule that erroneously used survey data on the presence of crayfish at a particular location as a substitute for a scientific assessment of population size. Among other deficiencies in the USFWS review for the species and proposed rule, the misuse of available data resulted in an inaccurate assessment of population size – grossly overstating the imperilment of the Panama City crayfish and understating the adequacy of Florida's existing regulatory mechanisms for protecting the species, statutory factors in any ESA listing determination.

Numerous local and state stakeholders will share additional views and data regarding the scientific deficiencies in the assumptions made in the USFWS listing determination, which I implore you to consider. I also encourage you to consider more closely the conservation

measures Florida has diligently undertaken with regard to the Panama City crayfish, and allow continued management of the species by Floridians under their successful regime rather than by the Federal Government under its failed Endangered Species Act.

Thank you in advance for your consideration of this request to prevent the addition of the Panama City crayfish to the ESA's List of Threatened and Endangered Wildlife. I look forward to continuing to work with you to protect America's great outdoors, power our future, and make America great again.

Sincerely,

A handwritten signature in blue ink, appearing to read "Neal P. Dunn", is written over the printed name and title.

Neal P. Dunn, M.D.
Member of Congress