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A Database for the ESA

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A Database for the ESA

The Forum article that begins on page 360, "The Effectiveness of the Endangered Species Act: A Quantitative Analysis," by Martin Taylor and colleagues, is particularly timely, given the number of bills before Congress to amend the Endangered Species Act (ESA).

The article is an example of an encouraging trend in discussions of the ESA. Taylor and his colleagues provide an empirical analysis of several key elements of the act, including one of its more controversial provisions, the designation of critical habitat. The ESA defines the term *critical habitat* as the area where the "physical or biological features...essential to the conservation of the species" are located. The act does not designate any habitat, leaving that task to the federal wildlife agency. The designation is to be based on the best scientific data available, together with an analysis of the economic impact of the designation. Although individuals on all sides of the issue have been willing to offer up judgments on the value of critical habitat, they have often done so without supporting empirical data. Anecdote, rhetoric, and even logic are poor substitutes for data. Lack of informed discussion neither builds trust nor casts light on the issue at hand. Taylor and colleagues shed some light; although their study establishes a correlation rather than causation, it does suggest that critical habitat makes a positive difference in the conservation status of at-risk species.

This article also highlights a related concern. Empirical analysis is dependent upon data. Taylor and colleagues were able to address the importance of critical habitat only after amassing a comprehensive database drawn from diverse sources. Other researchers who have sought to evaluate the act's accomplishments have also faced this challenge. The difficulty is that no single ESA database contains the full record of agency actions regarding listing, reclassification, consultations, and other decisions pursuant to the act. Although the Web sites maintained by the National Marine Fisheries Service and the US Fish and Wildlife Service are useful, they could be even more so if they were fully consistent with the record from the *Federal Register* as well as with one another.

A comprehensive database that contained a complete record of actions under the ESA would promote independent analysis by diverse parties and would improve discourse by complementing rhetoric with facts. The result would be better-informed policymakers, agency personnel, and members of the general public, as well as a more transparent and efficient ESA implementation process.

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