

Congress of the United States
Washington, DC 20515

The Honorable Daniel Ashe
Director, U.S. Fish and Wildlife Service
1849 C Street NW, Room 3331
Washington, DC 20240

Dear Mr. Ashe,

We are writing to express our concern over the Critical Habitat Designation (CHD) for the Loggerhead Sea Turtle issued by the U.S. Fish and Wildlife Service on March 25th. While we are supportive of management approaches to protect this endangered species, we are apprehensive of both the reasoning behind the rule, as well as the possible impact it may have on local economies, tourism activities and beach nourishment efforts.

The proposed rule cites beach sand placement as one of twelve primary threats to Loggerhead habitat. At the same time, the rule also states that beach nourishment can often have a beneficial impact on loggerhead nesting activities, as severely eroded beaches provide little habitat for female turtles to make nests. These contradicting statements are concerning because they create an unclear picture as to what the proposed rules means for efforts to renourish critically eroded beaches that fall within the designated areas. This sand placement along our nation's coastlines is essential to protecting life, property and critical infrastructure during severe weather.

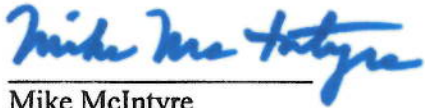
In addition, there are numerous economic benefits to wide, healthy beaches. Tourism associated with our nation's beaches provides roughly \$225 billion annually in business and tax revenue. The loss of coastal tourism can have a devastating impact on both the local communities and the national economy. We are troubled that the Fish and Wildlife Service has not yet produced a thorough assessment on the economic impacts of this rule.

The proposed rule also raises questions as to why the Fish & Wildlife Service believes that current efforts to protect the Loggerhead Sea Turtle are insufficient. Many state and local governments have management plans in place to preserve the turtle and its nesting habitat. In addition, all U.S. Army Corps of Engineers beach nourishment projects must go through a thorough environmental review process prior to approval. While the Fish and Wildlife Service did acknowledge these plans in its proposed rule, it is unclear what additional actions, if any, state and local governments will be required to take to further increase protective measures for Loggerhead Sea Turtles as a result of the designations.

We urge the Fish and Wildlife Service to perform a thorough impact assessment in a timely manner that takes all resources into account, including economic, recreational, and environmental. It is our belief that management tools to accomplish Loggerhead protections are best applied when all resources are balanced in the decision making process. We also urge you to clarify the reasoning behind the rule and the effects that it may have on local communities and beach management activities.

Thank you for your attention to this matter. We look forward to your reply.

Sincerely,



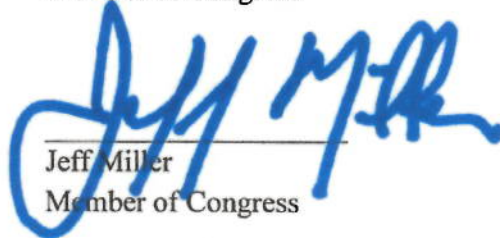
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Jo Bonner
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Walter Jones
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Tom Rice
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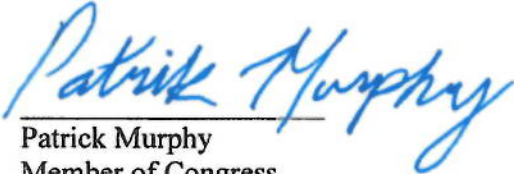
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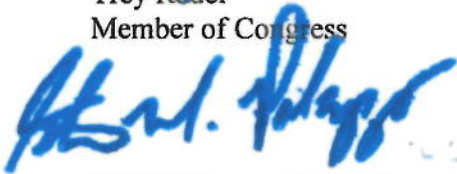
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