

SI Article 1 – Soliciting funding for recovery planning

Insufficient funding is a significant constraint for Endangered Species Act (ESA) recovery planning: there are not enough dollars to hire people to lead the development of recovery plans, much less implement those plans. Until traditional funding—from the United States Congress, the states, and others—is increased, it may be possible for the Fish and Wildlife Service (FWS) and/or National Marine Fisheries Service (together, “the Services”) to solicit funds to close the gap. For example, the Services might ask the regulated community to contribute funding for development of a recovery plan for a newly listed species. This would benefit the community because having a final plan with recovery criteria provides regulatory certainty. To minimize the risk of conflict of interest, or the appearance of conflict, the Services might solicit funding for non-recovery plan programs, then assign personnel whose pay is from standard sources to the recovery plan. This has been done in other ESA contexts, such as when the Fish and Wildlife Service lacked resources to review a large Habitat Conservation Plan (HCP) in Florida, and the HCP applicants paid the salary for a section 7 consultation biologist so that the local field office could assign another individual to work on the HCP (J. Malcom, *pers. obs.*).

Soliciting funding is not a panacea, and can introduce unwanted biases or perverse incentives. First, there may be many species that could benefit from a recovery plan but for which there is no “constituency” to fund recovery planning. Conversely, the availability of funding could result in planning efforts for species that may not benefit significantly. Second, even with one or more degrees of separation between an external funder and the Services personnel working on a recovery plan, there may be a perception of a conflict of interest. Rigorous scientific and public review can help ameliorate this threat, but are not guarantees.