December 17, 2019

Chairman Paul Gosar
Congressional Western Caucus
2057 Rayburn House Office Building
Washington, DC

Re: Western Caucus ESA Modernization Package

The National Cotton Council (NCC) is the central organization of the United States cotton industry. Its members include producers, ginners, cottonseed processors and merchandizers, merchants, cooperatives, warehousers and textile manufacturers. A majority of the industry is concentrated in 17 cotton-producing states stretching from California to Virginia. U.S. cotton producers cultivate between 10 and 14 million acres of cotton with production averaging 12 to 20 million 480-lb bales annually. The downstream manufacturers of cotton apparel and home furnishings are located in virtually every state. Farms and businesses directly involved in the production, distribution and processing of cotton employ more than 125,000 workers and produce direct business revenue of more than $21 billion. Annual cotton production is valued at more than $5.5 billion at the farm gate, the point at which the producer markets the crop. Accounting for the ripple effect of cotton through the broader economy, direct and indirect employment surpasses 280,000 workers with economic activity of almost $75 billion. In addition to the cotton fiber, cottonseed products are used for livestock feed and cottonseed oil is used as an ingredient in food products as well as being a premium cooking oil.

The NCC appreciates the opportunity to support the collective “Western Caucus (WC) Endangered Species Act (ESA) Modernization Package.” The NCC urges Congress to recognize and support these needed actions which will continue to maintain the legislative intent of the ESA while improving the clarity and integrity of ESA language. The numerous legal challenges brought against the current language demonstrate the need to clarify and modernize the ESA rather than continue a path embedded in costly law suits, inefficient use of federal employees’ time, and depleting funds that should be achieving restoration and delisting of species.

The NCC strongly supports the intent and principles of ESA and commends the authors recognition of the importance for ecological preservation and the inter-connected dependence of biological systems. The NCC additionally recognizes the challenges and complexities of carefully articulating concepts into policy obligations. Additionally, the terminology must be cautiously clarified in order to avoid continued challenges regarding the scope of the language. The NCC believes the package of bills proposed by the Western Caucus has identified many aspects of ESA that lacked clarification for those who were not participants in discussions and intent during the creation of ESA. The package also addresses unforeseen needs to prevent abuse of the system and taxpayer funds.
The NCC appreciates the work of the Western Caucus to modernize the ESA and supports the collective package of proposed bills. We also appreciate the opportunity for our industry to provide input on these needed updates and improvements to ESA.

Regards,

Gary Adams
President & CEO
National Cotton Council