ANIMAL
ALLIANCE
OF CANADA

Animal Protection Through Education & Advocacy

May 14, 2025

RE: Proposed interim changes to the Endangered Species Act, 2007 and a proposal for the Species Conservation Act, 2025

We are responding to Bill 5, An Act to enact the Special Economic Zones Act, 2025, to Amend the Endangered Species Act, 2007, and to replace it with the Species Conservation Act, 2025, and to amend various Acts and revoke various regulations in relation to development and procurement.

We oppose Bill 5 for the reasons explained below.

Introduction:

The rationale states: "the process for issuing permits is slow and complex, causing unnecessary delays and costs for housing, transit, and critical infrastructure projects, without resulting in significant gains for species." No examples are given of why the slowness or complexity, of permit issuing, causes delays that are "unnecessary". It is stated that the slowness, or complexity of issuing permits to allow the kind of "infrastructure projects" that do have a demonstrable record of reducing the environment's ability to sustain biodiversity (species). It calls these projects "critical", without defining the term. It does not say what "gains for species" would be deemed "significant".

We do know that habitat is critical to species survival, as explored in Appendix 1.

If species are in decline, it could be for any one or more (usually more) reasons that are not remedied by making permitting of projects that compromise the existence of those species faster, or simpler. Making the permitting process faster or simpler would do the exact opposite by facilitating those processes that contribute to species endangerment and/or mitigate against recovery.

We further believe that it is not the purpose of the ESA to make permitting of any project – but especially a project with the ability to reduce the carrying capacity of a habitat for wildlife species – endangered or not – faster or simpler. The only exception would be projects designed to reduce or stop endangerment or help threatened species to recover, or remain

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relatively stable where all potential habitat in the province is already at carrying capacity.

We are not arguing against the merits of removing "red tape". Presumably the requirements under the ESA were to protect consumers and the greater societal interests, which includes biodiversity and species survival, as well as the protection of viable farmland, fresh water and aquifers, and combatting climate change. Under Bill 5, all that goes away, not as a result of any democratic process or public evaluation, but because the government simply decides that conservation and biodiversity no longer matter, thus creating a zone outside the realm of democratic basics, oversight, prior legislation, or treaty rights, and regardless of expert opinion.

We are not suggesting that the ESA, or any other regulatory act, ought not to be examined by governments of the day as part of the process of responsible governance and due diligence.

We question how it has been determined by the Ontario government that "gains for species" have not been met, or even what, exactly, is meant by gains? And if there have been no "gains", should the species not only be protected but an evaluation done to determine the need for further protections?

Gains for Species:

For example, to the best of our knowledge, not a single species of native Ontario plant or animal has gone extinct since 2007, where "extinct" means the total loss of every individual of a species; an irreversible and uncorrectable loss.

To the best of our knowledge extremely few, if any, native Ontario species has been extirpated from the province since 2007, where "extirpated" means eliminated from the region in question, but not exterminated.
In that regard the ESA can be said to be "working", if its prime function is to prevent extinction and/or extirpation. It is failing if it is not preventing the increase in numbers of species under threat.

There are many species that were once common in Ontario whose numbers have experienced serious declines. Those declines have been either within Ontario, or regions of Ontario, or overall, throughout their respective ranges.
And there are other species that are found only in small numbers in Ontario that reach the terminus of their respective ranges in this province. This particularly applies to Carolinian species, not surprising given that the Carolinian environment, as a major ecozone, ends in extreme southern Ontario.

However, with both groups of ESA-listed wild plant and animal species, the major impediment to their existence is essentially the same: loss of supportive habitat.

It is irresponsible to imply that those human actions that most contribute to loss of viable habitat for so many species should be facilitated. These include housing, to the degree that it contributes to urban sprawl; transit, to the degree that it destroys essential habitat, blocks habitat corridors and contributes toxicity to the environment overall; and "critical infrastructure", the supportive technological "prosthesis" desired by an increasingly technology-dependent society.

We are not sure what "significant gains" for species listed would look like, but presumably it would mean that instead of the number of species on the list increasing, it would decrease.

We believe that the capability of many fact-based, scientifically supported ESA "red tape" as outlined in Bill 5 would be more effective if it were applied and enforced with more rigor. We believe lack of enforcement of existing "red tape" regulations contributes to the lack of gains. We are concerned that needs for environmental assessments are inadequate to the degree that they are either not enforced, or not done with thoroughness required to actually identify the needs of various wildlife species.

The claim by the government that the ESA is not working for many species is true but does not negate the fact that it is working for other species, helping their numbers to recover. **The dramatic increase in bald eagles, ospreys, merlins, and American white pelicans, are four highly visible indicators among apex predators that, indeed, conservation does work, and that human use of the environment need not be an impediment to increases in species that were, in recent memory, much rarer than they now are.** Where the ESA needs to be strengthened is in regard to protection of habitat for the most specialized, habitat-dependent species. For such species as the four mentioned above there was a simple cause-and-effect relationship between the "essential" use of organochlorides – and a search of the literature reveals they were deemed to be essential at the time – and severe declines in birds high on the food chain, as a result of bioaccumulation of toxins. When the cause of their respective declines was corrected by eliminating most use of DDT, the populations started to recover. As hard as it was to eliminate most DDT use, it was possible. Restoring habitat very often is not.

The Need for Habitat Protection:

There is a very similar cause and effect relationship between the destruction of habitat for various "essential" reasons, and the increasing numbers of plants and animals added to the ESA. The cause of each species' decline must be evaluated separately as an essential

part of any effort to make the ESA work. Saying it does not work is like saying doctors are doing a bad job of saving lives when the doctors are not allowed to do a diagnosis in the interest of "efficiency", to speed up treatment, or to cut through "red tape", all of which would be true but not best serve the patients' interests.

There are instances, especially among highly mobile and migratory species of wildlife, or plants adapted to long range dispersal, where primary cause of decline of the species in Ontario may not occur in Ontario, or may be shared between Ontario and other jurisdictions. Bobolinks have lost habitat in Ontario, but they are also shot in defense of rice crops in the Gulf States, or subjected to winter habitat loss, hunting, or the use of organochlorides in tropical America. Large numbers might perish in a given year if encountering a severe storm as they migrate across the Gulf of Mexico. Most species do not range nearly so far but the point is that their biological requirements for survival must be met throughout their range, obligating each region to assist if numbers are to recover.

For some species on the ESA list, Ontario is the terminus of their natural range, and for such species there may not be sufficient habitat to allow the species to expand. A Carolinian species such as the prothonotary warbler is limited in how many wooded wetlands can be found where it may breed. For the Acadian flycatcher options are similarly limited, making each suitable habitat vital to its survival in Ontario.

The Ontario government should have sought expert opinion before writing this document. They should have used the expert opinion to update and improve the ESA and circulated that document for public comment. Instead, we are commenting on Bill 5 that will fast track and allow the destruction of environments that otherwise support at risk species.

Habitats change through time via a process ecologists call "succession". This can lead to the naturally occurring loss of habitat viable for a species that then has no options to move to suitable habitats, said habitat lost because they did not, at the time, harbor ESA listed species.

We have seen, for example, a steady and alarming decline in our native turtle species in concert with potentially viable habitat for them. They may be relatively slow to disperse but they do, and as one region slowly changes to the point where it is not viable another may become suitable, if it has not been drained or paved over in the meantime.

Natural succession, including dramatically quick changes such as can be caused by great storms or forest fires, plus accelerating human activity, including climate change, must be included among the causes of species decline. It is prudent to enhance, not reduce, the

ability to protect species already at some level of decline or risk, and to prevent other species from following them into the abyss.

We will give examples of the importance of habitat protection in Appendix 1. First we want to emphasize that we recognize that all governments are caught up in a mesh of conflicting interests, changing priorities, claims, social needs, varying resources, and increasing levels of knowledge. But it is morally wrong to mis-represent government actions and intentions.

If the government does not want the ESA, or any other provincial act, to serve its purpose more fully, it should say so. In the case of the ESA, it should not claim or imply that it fails by slowing up the cause of so much wildlife species decline.

We have long regretted the government's general unwillingness to listen to expert opinion, or act from science-based knowledge. Such a coalition of expertise, stakeholders, and concerned public would, we believe, function better for all in the long run.

The Proposals:

1: An updated legislative purpose that allows for decisions to be made in consideration of social and economic factors as well as species protection and conservation.

This suggests that the government believes that biodiversity and the protection of species is an impediment to serving social and economic interests. This makes no sense if such interests are compatible with "species protection and conservation".

We believe any Conservation Act should prevent social and economic interests from impeding species protection and conservation. We believe that the implied idea that the two are inevitably in conflict is incorrect, and that species protection and conservation serves the greater social and economic interests overall.

We do not agree with the outdated concept of nature requiring domination and having no value beyond what profit it can generate until it is used up. **The ESA does need to be enforced**. We believe a change in "legislative interest" does not signal a sincere effort to remedy any failures of the ESA.
We believe the wording puts the ESA's original purpose behind all other interests, including "economic interests". We would like to know what it would take to convince the government that we are in a state of an environmental crisis where demand for and pressure on the non-human world has triggered massive declines in species. Renewable resources are now used up far faster than they can renew themselves and non-renewable resources are simply used at an accelerating rate without regard for the needs or interests

of future generations. We are seeing global extinction rates unprecedented in sixty-five million years, begging the question of why, then, should one of the few legislative means to protect species be weakened?

2: New definition of habitat that focuses protection only on the most critical areas needed by species

To change the meaning of *habitat* is an extremely dangerous goal if the true objective is conservation and the primary purpose of the ESA, to slow the decline and endangerment of native Ontario species.

Habitat is habitat. It varies in its properties through time, but there is no place where life occurs that is not habitat; "habitat" cannot be redefined. Habitat is all the areas that provide what a given organism needs to survive. *Generalist species*, like raccoons, crows, and coyotes, who are omnivores lacking highly specialized needs, are also very common for that reason. It is those species with more specialized needs that require more specialized habitats, and these need to be protected if the species are to survive in Ontario.

Thus, it is *precisely* those habitats that are **created** by "housing, transit, and critical infrastructure projects" that are **least critical** to most species.
The problem is that it is the habitats that "housing, transit, and critical infrastructure projects" too often **destroy** that are **most critical** to most species in decline – the "specialists", not the "generalists". The solution is to assure, through "red tape" in the form of assessments based on expert knowledge, that "housing, transit, and critical infrastructure projects" are placed where such habitat is not compromised. To do that requires an assessment of which habitats are "critical" to the specialized species. That is what the ESA is designed to do. **Failures are failures of due diligence and enforcement, not the ESA, itself.** Yes, it can be improved, but this Bill makes no effort to do so.

3: Government discretion on whether to apply protections when a species is scientifically classified as extirpated, endangered, or threatened.

Under current legislation, both federal and provincial, the classifications mentioned are already derived at "scientifically". However, third-party "discretion" negates the value of the objectivity science seeks. It opens the door for biases and corruption. Experts are not always right, and science is a process, never meant to or able to form final opinion, only to go where facts, not wishes or opinions, lead. It is still better to listen to experts, to heed what science has so far determined, than to ignore it.

Politicians cannot spend the time ecologists, environmentalists, zoologists, botanists, and others spend learning what is needed to formulate effective conservation policy or assess degree of threat to a given species or population. This stipulation should be removed.

4: Reduced duplication with federal legislation.

We sympathize with the purpose but urge that the wording be changed to read "Where provincial legislation duplicates federal legislation, the legislation that provides the higher likelihood of species protection or endangered species recovery should be the one that remains in the ESA".

5: Expanded ability to conserve species through a new Species Conservation Program.

Ontario citizens cannot be asked to comment on something without seeing it, and therefore this should be removed. If there is a new "Species Conservation Program" it must be presented to the people of Ontario for comment before it is implemented.

6: A risk-based, proportionate, and progressive compliance model, aimed at collaboratively addressing potential violations, will support these changes. If harm to species occurs, the ministry has to tools to enforce the law and hold proponents to account.

This seems to infer that if someone violates the law to a degree that compromises survival of a native wildlife species at some level of threat, or "potentially" does so, the government's response will be "proportionate", suggesting that the government will decide, based on its priorities – not the purpose of the ESA – which is the more or less serious violation. If that is a correct assessment of the meaning, our concern is that the decision of proportionality will reflect the government's, not the ESA's, priorities, thus putting profiteering, for example, ahead of species protection.

If a species is endangered, it is unhelpful to act **after** harm comes to it, as opposed to preventing the harm in the first instance. That is what the ESA should do by compelling the need to prove a given action, such as draining a wetland, will have negligible negative impact on, at the very least, a species listed under the ESA. A conviction and fine after the fact may not be much of a deterrent if the profit made justifies the cost of the punishment for a violation of the ESA. A species gone is forever gone while human needs are transitory in response to rapidly changing socio-economic conditions, themselves reactive to global environmental change.

7: Establishment of a registration-first approach in place of the current permitting framework that will allow businesses to drive their own timelines for their projects based on clear, consistent rules. The online registry will have requirements established in a future regulation.

We cannot comment on the "requirements" that are yet to be established. While we have no objection to businesses creating timelines, it is imperative that the starting point for activities with the potential to damage habitat needed by ESA-listed species should start only after full environmental assessments are made and assurances provided that no such damage will occur. Investing in land, equipment, hiring contractors and so on should not be guarantee of, or contribute to, approval.

8: Continued role of the Committee on the Status of Species at Risk in Ontario (COSSARO) in assessing and classifying species based on the best available science and information.

While we would like to see the committee expanded to include an ecological or environmental ethicist, in principle we have no objection to this.

Appendix 1:

Put simply, the Ontario government has previously recognized that the causative factor threatening Ontario's native wildlife is loss of viable habitat. The loss derives from the very kind of "development" that includes, "housing, transit, and critical infrastructure projects". We contend that because such causations have resulted either due to a lack of enforcement of the ESA, or because the damage occurred before the ESA came into being, in no way justifies making it easier to implement the very things that destroy habitat.

To make our point we take text about the cause of endangerment, extirpation, or extinction of native wildlife species from Ontario's own website, to demonstrate the importance of protecting, not easing the loss of, habitat necessary for survival.

We will restrict the list only to the most seriously threatened species – the ones listed as **Endangered**, **Extirpated**, or **Extinct**. We shall highlight references to habitat loss or degradation as these are what the ESA must prevent if to be effective.

We will also restrict the list to **land vertebrates** – herptiles, birds, and mammals, but we note that with regard fish, invertebrates, and plants, among the range of factors Ontario has acknowledged are causative in contributing to the endangerment of species, habitat loss or degradation are listed for the majority.

Of the list below, only the species of bats are deemed to have become endangered because of something other than habitat loss. Their serious and precipitous decline results from the introduction of a fungal disease organism, but not from loss of habitat, even though urban sprawl and infrastructure are also sources of bat mortality. The list emphasizes the importance of environmental assessments of any project that changes or has the potential to change the habitat required by species already at risk, or that face the likelihood of being at risk. This does not mean all species nor does it mean that there may not be remedial actions that can accompany development. But it does mean that it should not be made easier to enact the major cause of endangerment of our native wildlife, and subsequent biodiversity.

From Ontario's Own Website:

The **Allegheny Mountain dusky salamander**: The species is **ENDANGERED**. The text explains: "The Niagara area of Ontario has undergone significant development since European settlement, resulting in a loss of habitat quantity and quality." What harmed habitat is dams and water management, pollution from industrial effluents, excessive industrial effluents, and loss of habitat to an invasive plant, *Phragmites*, which displaces

native aquatic plants. These derive from the very things that need to be stopped by processes characterized as "red tape".

The **Blanchard's cricket frog**: The species has been **EXTIRPATAED**. The text explains: "The most significant factor which led to the decline and disappearance of Blanchard's Cricket Frog is the loss of wetlands due to development. Habitat degradation was also a factor since this frog does not tolerate pollution. Runoff of pesticides and fertilizers is believed to have been a major contributor to the disappearance of this species."

The **Fowler's toad**: The species is **ENDANGERED**. The text explains: "The main threat to Fowler's Toads is habitat loss and degradation. The loss and degradation of dunes, beaches, and wetlands as a result of shoreline development and recreation use, reduces areas for breeding, hiding, burrowing, and hibernating.

"Storm water runoff from urban, agricultural and industrial areas results in poor water quality in breeding and tadpole nursery areas and affects the survival of Fowler's Toads."

The **Jefferson salamander**: The species is **ENDANGERED**. The text explains: "Habitat loss and degradation caused by urban development, draining of wetlands and some resource extraction activities are the cause of the decline in salamander numbers in southern Ontario."

The **Northern dusky salamander**: The species is **ENDANGERED**. The text explains: "The Niagara area of Ontario has undergone significant development since European settlement, resulting in a loss of high quality groundwater habitat…In addition, uncontrolled stormwater runoff has caused slope instabilities in adjacent areas, leaving these salamanders vulnerable to rock falls and mudslides. Excessive trampling of seeps is also a threat to this species and their habitat."

The **small-mouthed salamander**: The species is **ENDANGERED**. The text explains: "The most significant threat to the Small-mouthed salamander is habitat degradation. Threats include reduction in forest cover that slows the evaporation of breeding ponds, removal of decomposing logs that provide habitats for invertebrates on which salamanders feed, and decreased water **levels."**

The **unisexual ambystoma:** The taxon is **ENDANGERED.** The text explains: "Habitat loss and degradation are the most significant threats to this species in Ontario. Salamanders are also killed on roads as they migrate to and from breeding ponds. This is a particularly serious issue when a road is located between a breeding pond and the forests where adult salamanders live. Chemical contamination of breeding sites, such as

agricultural or urban runoff, road salt, or pesticides, can cause developmental deformities and even mass mortality of eggs or larvae. Climate change and introduced diseases may become serious threats to salamanders in North America in the future." The species is range restricted and cannot be identified by sight alone, making it particularly vulnerable to extinction but also required a more, not less, sophisticated risk assessment of any human activity in its habitat.

The **blue racer**: This species is **ENDANGERED**: The text explains: "The most significant threats to the Blue Racer are habitat loss or degradation, loss of overwintering sites, human persecution, and road mortality." In Ontario the species is only known to be found on Pelee Island, and appears to be in decline.

The **Butler's gartersnake**: This species is **ENDANGERED**: The text explains: "The most significant threat to the Butler's Gartersnake is the loss of tallgrass prairie and other grassland habitat due to development in the highly urbanized areas where this species exists. Habitat fragmentation is also a problem since this sedentary snake is unlikely to cross large stretches of unsuitable habitat. Road mortality is another **threat**."

The **common five-lined skink:** The distinctive Carolinian population is **ENDANGERED**: The text explains: "The largest threat to both populations of Common Five-lined Skink in Canada is from "habitat fragmentation," or the breaking up of larger, continuous habitat into smaller patches of habitat. In the past, habitat fragmentation was increasing due to physical barriers and long-term climate change but is now also increasing due to human actions.

The Common Five-lined Skink faces many threats to its habitat from urban sprawl and commercial development, especially in southwestern Ontario. In the Carolinian population, transportation and service corridors have caused increased mortality and also barriers to skink movement.

Eastern Box Turtle: This species is **EXTIRPATED**: The text explains, "The extensive loss of forest cover from southern Ontario and overharvest of Eastern Box Turtles for food are likely the primary threats that led to the extirpation of this species from Ontario."

Gray ratsnake: The Carolinian population of this species is **Endangered**: The text explains, "The most significant threats to the Gray Ratsnake are the loss and fragmenting of habitat and persecution by people. Other serious threats include motor vehicles and the destruction of suitable hibernation sites."

Massasauga Rattlesnake: The Carolinian population of this species is **Endangered**. The text explains: "The most significant threats to the Massasauga are persecution by humans, mortality on roads, and loss of habitats. These threats led to the disappearance of this species from most of its historic range in southwestern Ontario."

Queen Snake: This species is **Endangered**. The text explains: "The most significant threat to the Queensnake is habitat loss due to drainage or disturbance of waterways, urban development along shorelines, and pollution. As a result of waterway pollution, crayfish, which require good water quality, have died out and Queensnake numbers have declined. Trampling by walking and standing on shoreline rocks has contributed to the deaths of some Queensnakes. Human persecution and illegal collection for the pet trade are also concerns.

Spiny softshell: This species is **Endangered**. The text explains: "The most significant threat to Canadian populations of Spiny softshell is habitat degradation, particularly due to riverbank stabilization, development along shorelines, changes in water levels, dams and recreation.

Spotted Turtle: This species is **Endangered**. The text explains: "The most significant threats are habitat destruction and illegal collection for the pet trade. Activities that alter the water table during the winter, such as digging a ditch along a road, can wipe out an entire population."

Timber rattlesnake: This species is **Extirpated**. The text explains: "Extirpated species and their habitat are protected if the species are again found in Ontario."

Wood Turtle: This species is **Endangered**. The text explains: "Ontario's Wood Turtles are at risk from habitat loss and degradation; predation by raccoons, skunks, foxes and pets; human activity such as illegal collection for personal pets or for the pet trade; and road mortality."

Acadian Flycatcher: This species is **Endangered**. The text explains: "The main threat to the Acadian Flycatcher is habitat loss and degradation due to clearing of forests for agricultural and urban development."

Barn Owl: This species is **Endangered**. The text explains: "The Barn Owl needs grassland habitats, and these are being lost to urbanization and changing farm practices.

As traditional wooden farm buildings are torn down and replaced by more modern bird proof barns, this owl loses suitable nesting sites.

Loss of habitat for the Barn Owl's prey (rodents such as voles) also poses a threat to the owl's survival."

Eskimo curlew: This species is listed on the Ontario website as **Extirpated**, but we believe the evidence is overwhelming that it is now **Extinct**: The text explains: "The three main factors believed to have contributed to the decline of the Eskimo Curlew are uncontrolled commercial hunting in the 19th century, habitat loss and fragmentation, and a decline in food supply, especially grasshoppers, at spring migration stopover sites. It is possible that human-caused changes to winter habitat in South America may have been an additional factor."

Golden Eagle: This species is **Endangered**. The text explains: "Golden Eagles are very sensitive to disturbance near their nests, for example, due to hiking, boating or noise from nearby developments. They can abandon their nests if harassed or kept away from the eggs or young too long. While the threat to their habitat from fire suppression and forestry is low in Ontario, other resource extraction activity, such as X and Y may threaten their habitat."

Greater Prairie-chicken. This species is Extirpated: The text explains: "The cultivation of native prairie was initially a benefit to the Greater Prairie-Chicken but then became the major threat to its survival. The first settler's grain crops supplied high energy food for the birds and their populations flourished. Then as prairie land was increasingly converted to farming, the habitat of Greater Prairie-Chicken was restricted to smaller and smaller areas. In Ontario, interbreeding with other species of grouse eliminated the Greater Prairie-Chicken in the Manitoulin Island area."

Henslow's sparrow: This species is **Endangered**: The text explains: "The main threat to the Henslow's Sparrow is loss of open field prairie habitat. Many of the sites where this bird once lived have been converted to pasture, crop lands, or tree plantations. Housing development has also removed suitable habitat."

King rail: This species is **Endangered**: The text explains: "Invasive species and the destruction and degradation of wetlands due to drainage, pollution and shoreline development have all played a role in their decline."

Kirtland's warbler. This species is **Endangered**: The text explains: "The main threat to Kirtland's Warbler is the limited availability of suitable habitat. Forest fire prevention and suppression, and development over the past century have reduced the amount of suitable jack pine forest."

Loggerhead shrike. This species is **Endangered**: The text explains: "Threats to the Loggerhead shrike may include habitat loss resulting from development (conversion of grasslands and pastures to cropland, residential development etc.) and succession (when open fields gradually change into thickets and forests)."

Northern Bobwhite. This species is **Endangered**: The text explains: "The main threat to the Northern bobwhite is loss of habitat due to intensive agriculture practices and urban development."

Piping plover. This species is **Endangered**: The text explains: "The main threat to the Piping Plover is human disturbance, since the sandy beaches where plovers live are also popular for human recreation which can destroy nests."

Prothonotary warbler. This species is **Endangered**: The text explains: "The main threats to the Prothonotary warbler are habitat destruction caused by the removal of dead and living trees, and the draining of the forested swamps that make up their exclusive habitat."

Red Knot: Two of three major populations of the North American subspecies of this sandpiper are listed as **Endangered** in Ontario. The text explains: "The main threat to the Red Knot *rufa* subspecies is loss of food at key migration sites. It times its spring migration to consume Horseshoe Crab eggs laid in Delaware Bay, and the unregulated commercial harvest of Horseshoe Crabs has resulted in a lack of food and a steep population decline.

Other threats include:

- predation and disturbance from increasing falcon populations
- possible impacts of climate change such as shifting weather patterns and rising sea levels"

The critical role Ontario can play in this long-range migrant would be protection of habitat on the north shore (James and Hudson's Bay shorelines) breeding habitat, and wetlands required for staging by this long-range migrant.

Yellow-breasted chat: This species is **Endangered**: The text explains: "Although it was likely never common here, the Yellow-breasted chat's preferred habitat of overgrown clearings has declined due to development, agriculture, and land management approaches that interfere with natural processes."

American badger: This species is **Endangered**: The text explains: "The main threat to badgers is habitat loss. Badger numbers likely declined as open grassland was converted to farmland and today urban development is a threat to this and many other species."

Eastern small-footed myotis: This species is **Endangered**: The text explains: "Eastern small-footed bats are threatened by white nose syndrome, which is caused by a fungus believed to have been inadvertently brought from Europe to North America…Wind turbines are another threat to this bat. Its magnitude is not known."

Little brown myotis: This species is **Endangered**: The text explains: "Little brown bats are threatened by a disease known as white nose syndrome, caused by a fungus which is believed to have been inadvertently brought from Europe to North America."

Northern long-eared bat: This species is **Endangered**: The text explains: "Northern long-eared bats are threatened by a disease known as white nose syndrome, caused by a fungus which is believed to have been inadvertently brought from Europe to North America."

Tri-colored bat: This species is **Endangered**: The text explains: "Tri-colored Bats are threatened by a disease known as white nose syndrome, caused by a fungus which is believed to have been inadvertently brought from Europe to North America."