

PENNSYLVANIA AUDUBON COUNCIL
2080 LINGLESTOWN RD, STE 201, HARRISBURG, PA 17110



July 2, 2021

Ms. Karen Farmer White, Chair
Pennsylvania State Board of Education
333 Market Street, 1st Floor
Harrisburg, PA 17126

Dear Madam Board Chair,

The Academic Standards for the Environment and Ecology adopted in 2002 marked an important milestone in the curriculum requirements for K-12 public school education. These standards made explicit the need for students in our schools to have the opportunity to learn and master the basic knowledge to equip them for the environmental challenges they will need to contend with as citizens in the 21st century. We are witness to the continuing need to understand, judge, and act at the local, state, and Federal levels to address the environmental and conservation challenges we increasingly face.

It is from this perspective that the Pennsylvania Audubon Council and the undersigned Pennsylvania Audubon Chapters submit these comments regarding the proposed 2020 Science, Technology, and Environment Standards. Among our specific concerns are:

- The new “integrated approach” in the proposed standards eliminates the explicit inclusions of the environment and ecology standards. It is important that these standards stand alone and be spotlighted. We need the current generations of students coming through our public education systems to achieve competency in these standards to be equipped to address the many environmental issues they will face today and tomorrow.
- It is reported that members of the “content committee” charged to help create the new standards felt that the process was rushed and that more time is required to review and include a large number of the environmental science and ecology standards. The current proposals need to be put on hold and more time be provided for the content committee to provide a thorough review.
- There are a number of areas that are either weakly connected or not connected at all to the proposed standards. Some specific examples include:
 - Watersheds and Wetlands, including their characteristics, role and function, and the impact and importance as an ecosystem, are not adequately addressed.
 - Ecosystems and their Interactions are critical for students to fully understand and comprehend if they are expected to be equipped with a working understanding of the science needed to make informed decisions as individuals and citizens in the communities they live.

- Threatened, Endangered, and Extinct Species in the face of climate change and human impacts require a “deep dive” into management decisions and practices to address the “sixth extinction” period in which our students will live.
- Environmental Laws and Regulations and understanding the responsibilities and role of citizenship in this arena are the ultimate performance standard for our graduates to function in the 21st Century.
- The proposed standards do not address the NAAEE’s Guidelines for Excellence in Personal and Civic Responsibility, Decision Making and Action Skills, and other areas.

In conclusion, the Environment and Ecology Standards need to be maintained as a separate, fifth domain and not lost or underserved as a result of their integration with other areas. In addition, full consideration needs to be given to refer the proposed standards back to the “content committee” so they receive a full and adequate review.

Thank you for the efforts of the Pennsylvania State Board of Education to ensure that the curriculum of the 501 school districts across the Commonwealth reflect challenging and meaningful standards for the students we serve.

Thank you for your consideration of these comments submitted on behalf of the Pennsylvania Audubon Council and the undersigned Pennsylvania Audubon Chapters.