Data Submitted (UTC 11): 1/3/2018 12:00:00 AM

First name: Anonymous Last name: Anonymous

Organization:

Title:

Comments: Under ESA, anyone can submit unlimited petitions to the FWS or NMFS to list species as "threatened" or "endangered." There is no requirement that the agencies considering these petitions actually count the species populations prior to listing. Thus, there is no real measurable numerical goalpost to justify the agencies' determination that a species deserves to be listed or to justify what would be needed to recover them once they are listed. alternative approaches authorized by ESA to recover listed species, such as use of artificial propagation, are often ignored in favor of scapegoating human activity. Agricultural crop protection products that already undergo extensive regulation under one federal statute must go through consultation with FWS and NMFS, which have little expertise, resulting in consultation delays and litigation, a recent review of information reveals that more than 30% of all "delisted" species were removed from the ESA list due to data errors, indicating that they should never have been listed in the first place. Even when a species has been deemed recovered, certain Activists groups continue litigating to keep the species on the list. State and tribal representatives have expressed concern that federal proposed recovery timeframes are too lengthy and lack incentives for local, state and tribal entities to delist species, also, concerned that federal ESA recovery goals are being set too high, and that they include objectives unrelated to species, such as greenhouse gas emission targets. Litigious groups are petitioning for new species that lack even common names or descriptions, citing from a database called NatureServe, which is not reliable as an accurate or complete source of data. Too often, the "science" included in citizen listing petitions is directly relied upon in the 90-day findings and is then codified as "fact" by the time the 12-month review is completed, and 12-month reviews are sometimes subjected to ad hoc and informal peer reviews that may amount to no more than an email distribution of the document with informal comments received. NMFS created and has used a different means to quantify and classify populations of fish. NMFS characterizes populations of salmon and steelhead as "evolutionary significant units," 116 whereas the FWS utilizes "distinct population segments" as defined by ESA under section 4. that FWS and NMFS have used lessthan-transparent processes to ensure that they can list a population of species, even though doubts have been raised about the science underlying a listing proposalESA is bowing to out-of-the mainstream and unjustified agendas of certain groups. One Activists in 2010 states "where humans multiply extinction follows, and that the planet cannot continue to sustain both an exponentially growing human population and the healthy abundance of other species." One biologist went so far as to defend his statement that "the collective needs of non-human species must take precedence over the needs and desires of humans." Another stated that "humanity threatens to turn the earth into a planet of weeds." These groups and many conservation biologists believe the primary reason for lawsuits is "to hold the government accountable" on forcing habitat protection and acquisition from private landowners for species. In 2009, environmentalist activist stated: "When we stop the same timber sale three or four times running, the timber planners want to tear their hair out. They feel like their careers are being mocked and destroyed - and they are. Psychological warfare is a very underappreciated aspect of environmental campaigning." these statements foster a contentious atmosphere that creates unnecessary conflicts between humans and species, rather than encouraging cooperative efforts to aid species.