

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

First name: Anonymous

Last name: Anonymous

Organization:

Title:

Comments: The core talent of a successful environmental activist is not science and law. It's campaigning instinct. The un-professionalization of the environmental movement has injured ESA greatly. These kids get degrees in environmental conservation and wildlife management and come looking for jobs in the environmental movement. They've bought into resource management values and multiple use by the time they graduate. I'm more interested in hiring philosophers, linguists and poets. That's not only not taught in the universities, it's discouraged. A college student doing biological surveys funded by FWS Section 10 recovery permits falsely reported seeing an endangered species on privately-owned property in his survey area, but the FWS did not immediately report it. The student later said it was "a joke" but this incident nevertheless resulted in a gravel company having to modify its operations under ESA. Once an ESA listing or critical habitat decision has been made, there is enormous resistance to utilize new, more accurate information or to reconsider any of the "science" used to support the original decision. According to the FWS and NMFS, ESA requires them to conduct "status reviews" of each listed species every five years. Few of these status reviews result in down listing or de-listing of species. Concerned that FWS and NMFS are ignoring clear statutory requirements to coordinate and resolve inconsistencies with counties' plans and ensure public involvement on ESA actions that impact county and tribal land use. One of the main contributing factors listed by FWS for the decline of GSG populations is wildfire destruction of sagebrush habitat. The BLM has noted that "Wildfires are a leading cause of sagebrush loss." Land managers throughout the west are concerned that habitat loss to wildfire could push a sage-grouse listing. Nevada State Forester Pete Anderson recently stated, "Virtually every time we're getting a fire we're getting some impact to sage-grouse habitat." Ironically, ESA litigation, as noted earlier has, in many cases, contributed to the poor forest health conditions that create greater risk of wildfire. Representatives of states have testified on multiple occasions that states are best equipped to manage resources within their own boundaries, and that federal plans can complicate species conservation because they are often inconsistent with state and local plans. States, tribal and local governments are devoting hundreds of millions of dollars annually in on-the-ground species protection actions, and are leveraging those funds with private conservation efforts. It would seem that a clear reading of section 6 would lead to promoting examples where states and the federal government can effectively manage ESA-listed species cooperatively. However, in a past year a state's attempt to negotiate cooperative agreements with the FWS under section 6 to improve species management and streamline permitting processes, resulted in a lawsuit by environmental activist groups. States view this as a "huge chilling effect" for other states and private landowners desiring to enter into agreements for constructive conservation without being sued. Since states are often developing more current and better data than federal agencies for species conservation, they also are developing their own defensible recovery goals and plans for species, and in certain cases, doing so because the federal agencies failed to do it. federal agencies should use state wildlife data and analyses "as a principle source" to inform their land use, land planning and related natural resource decisions, to not duplicate analysis of raw data previously prepared by the states, and that federal agencies should provide their data to state wildlife managers to ensure that the most complete data is available to be incorporated into all decision support systems.