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Comments

In the current proposed rule it makes provisions to maintain and restore the conditions of candidate species that are not yet listed under the Endangered Species Act. This demonstration of proactive management is welcome as the US Fish and Wildlife Service is continuously overburdened with species to consider and it gives candidate species on relevant land unprecedented protection they have not seen before. That being said, because the actions within the National Forest System Land is the limit of this rule it should be acknowledge the likelihood of the actions of the Agency to keep a candidate species from requiring protection under the Endangered Species Act is incredibly slim. Their actions will certainly help the candidate species, however they cannot be expected to single handedly foster the recovery of the species or population.

Should a candidate species come into conflict with another species of concern it should be determined which species is under a stronger threat of extinction. If the other species is listed under the ESA as threatened or endangered than it will be necessary to try and move forward the candidate species for a determination of standing. Being listed as a candidate species should not be considered as being less vulnerable than those currently listed, but simply as undetermined as of yet. The species that is in the most immediate danger of extinction should receive the higher conservation priority, unless the ecological, social, or economic nature of the other species would have greater impacts then it a more in depth consideration should occur prior to the decision.

Where candidate species conflict with other management objectives the goal should be to pursue the other management objectives without actively changing the status of the species. It is difficult to manage a triple bottom line of environmental, economic, and social management objectives and compromises are consistently made in order to get the best possible management scenario. The compromise for the candidate species is that it should be seen as preferable to try and provide for the recovery of candidate species, but mandatory to maintain the current population of the candidate species. In the case of competing interests it should be seen as acceptable, though not desirable, to forgo recovery efforts, but unacceptable to further reduce the candidate population.

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