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March 15, 2016

Dr. Christopher Servheen
Grizzly Bear Recovery Coordinator
U.S. Fish and Wildlife Service
University Hall, Rm #309
University of Montana
Missoula, MT 59812

Dear Dr. Servheen:

On behalf of our supporters, The Humane Society of the United States (HSUS) requests an extension of the comment period on the proposed rule removing the Greater Yellowstone Ecosystem (GYE) population of grizzly bears (*Ursus arctos horribilis*) from the federal list of endangered and threatened wildlife. 81 Fed. Reg. 13,173 (March 11, 2016). The Fish and Wildlife Service (FWS) only provided a 60-day comment period with the comment period ending on May 10, 2016. For the reasons set herein, we respectfully request that the comment period be extended an additional 60 days, so that the comment period closes on July 8, 2016, in order to fully analyze the relevant documents and to prepare substantive and informed comment responses. Additionally, due to the controversial nature of the proposed rule we would request that the FWS provide stakeholders additional opportunities to participate in public hearings.

1. **The Proposed Rule and the accompanying documents including the Draft Supplement to the 1993 Grizzly Bear Recovery Plan for the Yellowstone Grizzly Bear Population and the Draft Conservation Strategy are over 870 pages in length.** There is a large amount of information to review for legal and scientific issues related to the grizzly bear ecology and natural history, population dynamics, the effect of hunting on isolated populations; the effect of hunting on human-habituated, national park bears; mortalities by state and the cause of grizzly bear mortalities and other relevant matters. In addition, documents related to state management of grizzly bears in Wyoming, Montana, and Idaho such as memorandums of understanding, management plans, and state laws and regulations will also have significant relevance for the actual impact of the delisting rule on grizzly bears and need to be considered adding to the volume of material that commenters need to review during the comment period. In order to adequately analyze and provide detailed public comments, the FWS should provide all parties 60 additional days to comment.

2. **It is insufficient to provide the public with only two public hearings when dealing with a diverse and widely distributed set of stakeholders and such a controversial topic.** Grizzly bears belong to the entire public across the US. Given that their historic range was from Canada to Mexico and that this rule pertains to a highly controversial issue for the broad American public, the FWS has an obligation to hold public hearings on grizzly bear delisting issues in adequate numbers and at locations that are reasonably accessible to a large amount of widely distributed stakeholders. The FWS has scheduled only two public informational meetings and public hearings on April 11, 2016, in Cody, Wyoming and on April 12, 2016, in Bozeman Montana. While we appreciate that the fact the Service is providing the public with the opportunity to attend public meetings, we would request that more meetings be held where more of the interested public can participate, rather than limiting the public to two localities. This rule has broader appeal beyond just the states where the grizzly bears currently reside. People from all over the U.S. travel for the opportunity to see grizzly bears and this rule will have an impact on them as well. We request a broader distribution of cities where the general public can have the opportunity to weigh in on this important issue. At the very least, hearings should be held in a few western cities such as Seattle, Washington; Denver, Colorado; Albuquerque, New Mexico; and Sacramento, California; as well as be held on the East Coast such as in Washington, DC.

For the foregoing reasons, the HSUS requests that the FWS extend the comment period on the GYE grizzly bear proposed delisting rule by 60 days and provide additional public hearings for stakeholders to attend.

Thank you in advance for considering this request. Please contact me either by electronic mail (ksedlacek@hsus.org) or telephone (202-955-3661) as soon as possible to inform me of your decision on this matter or if you should have any questions about this request.

Sincerely,

Keisha Sedlacek

Keisha Sedlacek
Senior Regulatory Specialist
The Humane Society of the United States