HOT SPRINGS COUNTY COMMISSIONERS

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May 5, 2016

Public Comments Processing
Atten: Docket # FWS R6-ES-2016-0042
US Fish and Wildlife
MS: BPHC
5275 Leesburg Pike
Falls Church VA 22041-3803

Re: Comment, Grizzly Bear Delisting

Dear Sirs:

On March 11, 2016, the US Fish and Wildlife published the proposed Yellowstone Grizzly Bear Delisting Order and two other related documents; a draft supplement to the 1993 Grizzly Bear Recovery Plan and a draft Conservation Strategy in the Federal Register.

As county commissioners representing Hot Springs County Wyoming, we believe that our constituents have been and will continue to be profoundly impacted by grizzly bears and the practical and very emotional issues attached to this iconic species. Therefore, pursuant to the request for comments, please consider the following:

Delisting Order:

"The best available scientific and commercial data indicate that the Greater Yellowstone Ecosystem (GYE) population of grizzly bears (*Ursus arctos horribilis*) has recovered and no longer meets the definition of an endangered or threatened species under the Endangered Species Act, as amended (Act). The United States Fish and Wildlife Service (Service) is also proposing to identify the GYE grizzly bear population as a distinct population segment (DPS). The Service also proposed to revise the List of Endangered and Threatened Wildlife, under the authority of the Act, by removing the GYE population. The Service has determined that the GYE grizzly bear population has increased in size and more than tripled its occupied range since being listed as threatened under the Act in 1975 and that threats to the population are sufficiently minimized."

Hot Springs County considers this matter long overdue for action. In spite of established science, proven game management practices, and common sense any proposed action to moderate the growth of grizzly populations has been met with legal and political opposition. This is unfortunate, as it defies logic and has resulted in a greater frequency of conflicts between grizzlies, humans, and livestock.

Hot Springs County **strongly endorses** the proposed Delisting Order and the associated DPS segment identification, as the Greater Yellowstone Ecosystem (GYE) grizzly bear is now fully recovered. Furthermore, the population has exceeded the recovery criteria for several years and represents one of the most significant success stories in the history of wildlife conservation. Consequently, **IT IS TIME TO DELIST THE GRIZZLY BEAR.**

In Hot Springs County, grizzlies are a major predator on both sheep and cattle. In 2014 and 2015 alone, USDA Wildlife Services verified 11 cattle and 59 sheep killed by grizzlies. Hunting opportunities have significantly diminished, due to similar predations on big game species. Furthermore, activities such as hiking and camping have been significantly reduced in Hot Springs County as recreationists go elsewhere to avoid the likelihood of a bear encounter. The recently-adopted Shoshone National Forest Master Plan has noted that overnight camping in that national forest has been reduced by half over the past 20 years, and that wilderness backpacking has also been substantially reduced.

Hot Springs County recognizes that the Wyoming Game and Fish Department (WGFD) has been instrumental in supporting the recovery of this iconic species. Without the compensation program initiated by the WGFD, most of the permittees grazing cattle in Hot Springs County would no longer be there. Individual members of the WGFD have worked tirelessly to resolve such conflict issues whenever grizzlies harass, cripple, and kill livestock.

Hot Springs County also believes that the Federal Conservation Strategy developed for management once the bear is delisted should only be in place for five years after delisting, as intended by the federal rules. After five years, management should become the responsibility of the Wyoming Game and Fish Department (WGFD). The proposed conservation strategy appears to be perpetual, however, and would not allow this to happen.

Finally, Hot Springs County recognizes that decades of grizzly protection have removed the grizzly's fear of man. This is detrimental to the bear, as he now sees no need to avoid confrontations with humans, livestock, or buildings. Licensed hunting is a proven wildlife management technique that not only helps control populations but would reintroduce a healthy desire in the grizzly to teach its young to avoid humans. This would be desirable for both species, and we wholeheartedly state that hunting – guided by wildlife science and under the regulation of the Wyoming Game & Fish Department – must be a part of the regimen used to control grizzly populations in the future.

Hot Springs County appreciates this opportunity to comment on the Yellowstone Grizzly Bear delisting effort.

Hot Springs County Board of County Commissioners,

John P. Lumley, Chairman

cc: Governor Mead
Washington Congressional Delegation
WCCA-Pete Obermueller
YES Committee Chairperson Mary Erickson
Wyoming Game & Fish - Attn.: Brian Nesvik