Beaverhead County Commissioners
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May 5, 2016

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

Dear Sirs:

The US Fish and Wildlife published the proposed Yellowstone Grizzly Bear Delisting Order, a draft supplement to the 1993 Grizzly Bear Recovery Plan and a draft Conservation Strategy on March 11, 2016 in the Federal Register.

The Beaverhead County Commissioners (Montana) recognize that the residents and visitors of Beaverhead County have been impacted by the Grizzly Bears in our area.
Please consider the following comments:

Delisting Order:

The Beaverhead County Commissioners firmly support the proposed Delisting Order and that the Yellowstone Grizzly Bear (YGB) has recovered. The population counts have exceeded the recovery criteria, which truly has been a successful wildlife conservation project.

Draft Supplement to the 1993 Grizzly Bear Recovery Plan:

Beaverhead County is strongly supportive and confident that Montana (Idaho & Wyoming) has the required capabilities to manage and monitor the Grizzly Bear once delisted. Mortality and numbers would be used in the total population data.

Please note the last line of the first paragraph on page 8 of the draft that reads “Grizzly Bears will not be persecuted just because they are present there” is unnecessary. Montana (Idaho & Wyoming) can manage the Yellowstone Grizzly Bear (YGB) population according to their approved management plan.

The Beaverhead County Commissioners believe any perpetuity reference should be deleted. Montana (Idaho & Wyoming) Wildlife Agencies can manage a “specific species” to remain viable and recovered.

Draft Conservation Strategy (CS):

Chapter 1 – Background:
Beaverhead County supports the CS to be evaluated every five (5) years with a public comment period. Beaverhead County supports the concept of the Yellowstone Grizzly Bear Coordinating Committee (GYCC) replacing the Yellowstone Ecosystem Subcommittee (YES).

Chapter 2 – Population Standards:

Beaverhead County opposes the need for Fcoy minimums, distribution in management units and mortality of dependent young.

Questions:

Page 35 – Total population won't drop below "48 females with cubs in 2 consecutive years".

Page 3 – Demographic recovery criteria reads "3 consecutive years"

Figure #3, Page 38 – reads Fcoy model average minimum of 48

Page 21 – reads entire population was 58 but does not include the Fcoy in the DMA.

Chapter 3 – Habitat Standards:

Beaverhead County believes any changes to date that have been implemented within the parameters of the current Forest Service and BLM Management Plans should be "Grand Fathered".

Questions:

Page 6 – the three standards listed ? - #3 "with some exceptions for administrative and maintenance needs" ??

Page 56 – doesn't discuss those exceptions

Page 7 – four habitat criteria *by each agency* must be measured and reported*

Page 57 – only discusses 3 out of 4 in detail

Page 48 – "annual unknown and unreported" – this needs a better explanation

Page 51 – seems cost prohibitive??perpetuity??

Page 57 – who will review/update the habitat standards and what is the process?

Page 59 - #2 paragraph "levels of secure habitat and motorized route density are monitored on Federal lands outside the PCA to identify and prevent potential habitat threats". Who will define, monitor and decide? What if that process is inconsistent with the current Forest Service/BLM Management Plan? (grand fathered)

Page 63 – temporary reduction in secure habitat mentions only Federal projects. Beaverhead County is concerned with road projects in the future for both state and county!!

Page 84 – first line indicates that there is little evidence of a relationship between Hunter numbers and Grizzly Bear mortality. The next paragraph indicated that the greatest source of mortality is due to interaction with Hunters. If the number of Hunters has been shown as not relevant, why does Montana (Idaho & Wyoming) have to collect the number of Hunters for this CS? Unfunded Mandate?!

Chapter 4 – Management of conflicts:

Questions:

Page 8 and 93 – removal limitation only allows removal as "maybe given to public research institutions or public zoological parks". Why should the CS limit the future recipients? In Montana (Idaho & Wyoming) this decision on removal is addressed in their State Grizzly Bear Management Plans.

General Comments:

There are 16 appendices listed in the CS. None are currently available for public review on the listed website. Neither we nor the public can comment.

The Beaverhead County Commissioners are concerned with Federal Regulations affecting private lands. The county is aware of some parcels of private land that are within the current DMA boundary. The CS may adversely impact private landowners and the process for satisfying a damage claim for/on both real and personal property will be difficult.

Beaverhead County has strong concerns with connectivity and the linkage topics. Natural migration out of Yellowstone National Park will and has happened. Human, Traffic and Livestock conflicts will and have happened. Montana, Idaho and Wyoming need to manage the Grizzly Bear out of Yellowstone Park.

Genetic Management of the Grizzly Bears can be accomplished by transport/hauling the Grizzly Bears to any one of the 5 recovery zones.

The USDA Sheep Experiment Station at Dubois, Idaho is absolutely not needed for Grizzly Bear management. There is 70+ years of range and sheep data on record to help producers and Agency Range Tech. better manage both the sheep and their/our range resources. The Sheep Experiment Station is one of the largest employers in Clark County Idaho. Clark County and the sheep industry shouldn't be the "sacrificial lamb" for Grizzly Bear management.

Thank you for this opportunity to comment on the Yellowstone Grizzly Bear delisting.

Regards,



C. Thomas Rice
Commissioner



Michael J. McGinley
Chairman



Garth L. Haugland
Commissioner