SUBLETTE COUNTY LETTERHEAD
5/3/16

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

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 Sublette County Wyoming, we believe that our constituents have been and will continue to be uniquely 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".

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

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 the Upper Green would no longer be there. Individual

members of the WGFD have worked tirelessly, even 24/7, to resolve conflict issues when grizzlies kill livestock.

In the past four years, based on numbers provided to Sublette County by the Upper Green River Valley Cattle Association, confirmed depredations caused by grizzly bears have increased from 20 in 2010 to 80 in 2015. Since 1995, there have been over 500 head of cattle confirmed to have been killed by grizzly bears on this allotment. Sublette County fully supports delisting of this species, as they have met every recovery goal ever established, and there have been several. Further, Sublette County supports sport hunting of this species in areas like the Upper Green, where substantial conflict exists. We support management flexibility to address individual bears, not just numbers in a matrix.

The Upper Green is part of the Designated Monitoring Area (DMA). When the DMA was created it was supposed to be an area both biologically suitable and socially acceptable for grizzly bear expansion. Sublette County believes that though the area is biologically suitable, it is NOT socially acceptable due to the level of conflict with multiple use activities including recreation and livestock grazing. We ask that you reconsider the boundaries of the DMA in this regard.

Sublette County believes that the Federal Conservation Strategy developed for management once the bear is de listed 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 existing proposed conservation strategy appears to be perpetual and would not allow this to happen.

Sublette County appreciates that opportunity to comment on the Yellowstone Grizzly Bear delisting effort.

Sublette County Commission,

Andrew Nelson, chairman

Cc: Gov Mead, Washington delegation, WCCA-Pete Obermueller, YES Committee Chairperson Mary Erickson, Wyoming G&F-Brian Nesvik