

From: [Robert Aland](#)
To: [Bean, Michael](#); dan_ashe@fws.gov
Cc: wayne_kasworm@fws.gov; Matt_Hogan@fws.gov; Michael_Thabault@fws.gov; Noreen_Walsh@fws.gov; Bridget_Fahey@fws.gov; [Seth Willey](#)
Subject: GRIZZLY BEARS - INVOLVEMENT BY NOTORIOUS APHIS "WILDLIFE SERVICES"
Date: Tuesday, December 13, 2016 10:43:23 PM

Dear Messrs. Bean and Ashe:

I had not been aware of the extent to which the notorious federal wildlife slaughter agency, the USDA Animal & Plant Health and Inspection Service's Wildlife Services, will be involved in the post-delisting "management" of grizzly bears until I read Wildlife Service's 268-page "Environmental Assessment – Predator Damage and Conflict Management in Wyoming" issued in November 2016 in which grizzly bears play a prominent role. Wildlife Services, as you no doubt are well aware, makes every effort to operate far under the radar because it serves an extremely small constituency and employs very nasty methods to carry out its perceived mission.

The link to this Wildlife Services Environmental Assessment (EA) is as follows:

<https://www.regulations.gov/document?D=APHIS-2016-0084-0001>

This is one of the most disgusting documents I have ever read. It is beyond comprehension that an agency of our federal government, an agency that, like all other agencies, is supposed to serve the interests of all Americans, could issue such a license to kill wildlife that belongs to all Americans. The entire EA could have been limited to five pages; instead it is stuffed with page after page of repetitious boilerplate language designed to give the appearance of careful analysis.

The important point for purposes of this email is that this EA, which no doubt will be finalized in due course (The comment period expires on 12-16-16.), should cause the **immediate termination** of the US Fish and Wildlife Service's current delisting efforts with regard to grizzly bears in the Greater Yellowstone Ecosystem, since this EA obviously causes an automatic violation of the ESA delisting factor set forth in 16 USC § 1533(a)(1)(D), the post-delisting adequacy of existing regulatory mechanisms, and probably other factors too. This EA, simply stated, gives Wildlife Services an unfettered license to kill GYE grizzly bears and other predators; and history shows that Wildlife Services for many years has been very good at doing just that in numbers that are shocking; and, therefore, Wildlife Services will not protect GYE grizzly bears after delisting and instead will destroy them.

Although I might have missed it, I do not even see in the EA any indication that Wildlife Services considers itself bound by (1) the absurdly small mortality limits that you have adopted for GYE grizzly bears or (2) Director Ashe's MOA divvying up mortalities.

Have you been consulted by Wildlife Services with regard to this EA? If yes, did you approve it? I will appreciate receiving answers to these two questions.

If you proceed with delisting, which probably is a foregone conclusion, this EA must be (1) described in the Final Delisting Rule and accompanied with your explanation of why it did not prevent delisting and (2) included in the Administrative Record for post-delisting litigation purposes. If you fail to do (1) and (2), any Declaration submitted to the reviewing court with regard to the accuracy and completeness of the Administrative Record by your counsel will be fraudulent in my opinion.

Sincerely,

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