

U.S. FISH AND WILDLIFE SERVICE

MOUNTAIN-PRAIRIE REGION

Greater Yellowstone Ecosystem Grizzly Bear Delisting

PUBLIC HEARING - BOZEMAN, MONTANA

April 12, 2016

Bozeman Holiday Inn

HEARING OFFICER:

LESLEY TRAVERS

DEPUTY REGIONAL DIRECTOR:
Mountain-Prairie Region

MATT HOGAN

I N D E X

		PAGE
1		
2	SPEAKER	
3	DAVE PAULI	11
4	ASHEA MILLS	14
5	WAYNE MOORE	17
6	TOM GRIMES	19
7	CLARENCE SANDERS	19
8	MARK HUFSTETLER	20
9	WENDY HERGENRAEDER	22
10	PAT SIMMONS	24
11	TIM BORDER	26
12	ELISSA CHOTT	29
13	JOSHUA DICKINSON	30
14	KRIS ELLINGSEN	32
15	GEORGIA BAKER	34
16	KELLY NOKES	37
17	JERRY MUETHING	40
18	MARLA MARTIN	42
19	KIERSTEN IWAI	43
20	SHARON SUTHERLAND	45
21	CLINTON NAGEL	47
22	GLENN MONAHAN	49
23	ROGER HAYDEN	52
24	NANCY SCHULTZ	54
25	SETH MANGINI	57

1	INDEX (Continued):	
2	SPEAKER	PAGE
3	ANDREA SANTARSIERE	60
4	DON BACHMAN	62
5	DON SULLIVAN	64
6	RACHELLE MOELLER	67
7	DEREK GOLDMAN	68
8	MICHELLE UBERUAGA	70
9	AMANDA KIMMEL	73
10	RANDY NEWBERG	74
11	STACY PHILBRICK	77
12	JIM LAYBOURN	78
13	KAT BREKKEN	81
14	JOSIAH UTSCH	83
15	JEANNE WILKINSON	85
16	CAROLINE BYRD	87
17	W.R. MEALAR	90
18	SHANNON TAYLOR	92
19	RYAN MOLDE	93
20	KERRY WHITE	96
21	KURT ALT	98
22	LOUISE WILLCOX	100
23	ROBERT BRIGHAM	102
24	PAUL LALLY	104
25	RICK SITTS	105

1	INDEX (Continued):	
2	SPEAKER	PAGE
3	TROY BERTELSEN	107
4	ZACH CARDOSI	108
5	MYRANDA HAGEMANN	110
6	KEN SINAY	112
7	KELLI AYHOR	114
8	BRYON DINGMAN	117
9	BRIAN CHATTIN	118
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		

P R O C E E D I N G S

5:00 p.m.

MS. TRAVERS: This is a public hearing regarding the Greater Yellowstone Ecosystem Grizzly Bear Delisting.

Please take your seats. We are now on the record.

Good evening, and welcome to this public hearing. My name is Lesley Travers, and I will be your hearing officer tonight.

My role is to conduct this hearing in order that we receive your comments accurately into the record, and to allow as many of you as possible any opportunity to comment on the proposed delisting rule for the Greater Yellowstone Ecosystem grizzly bear.

I represent no point of view about grizzly bears or their recovery, or delisting. I am not affiliated with the U.S. Fish and Wildlife Service, and I don't represent them.

My purpose here tonight is to help things run smoothly and to allow as many of you as possible an opportunity to comment on the U.S. Fish and Wildlife Service's proposal to remove the grizzly bear in the Greater Yellowstone Ecosystem from the List of Endangered and Threatened Wildlife.

1 If you have already signed in, or if you have
2 questions, you will find a registration table just
3 outside this room with Fish and Wildlife Service staff
4 to assist you and answer your questions.

5 This is a public hearing under
6 Section 4(b)(5)(E) of the Federal Endangered Species
7 Act, as amended.

8 Notice of the public hearing was published in
9 the Federal Register on March 11, 2016, in Volume 81 on
10 Pages 13174 through 13227. The comment period ends at
11 the close of business on May 10, 2016.

12 After review and consideration of your
13 comments and all other information gathered during this
14 comment period, the U.S. Fish and Wildlife Service
15 expects to make a final determination on the proposal
16 in 2016.

17 The purpose of this hearing is to receive
18 your comments on the proposal. Comments on all aspects
19 of the proposal are very important and will be
20 carefully considered.

21 Because of the importance of your comments,
22 it is necessary that we follow certain procedures this
23 evening. If you want to present comments at this
24 hearing, please register at the table outside this
25 room.

1 When you register, indicate any organization
2 that you are representing in your comments today. I
3 will call speakers in the order they are registered.

4 Your comments tonight will be recorded and
5 transcribed by a court recorder. Both the transcript
6 and all written comments will be reviewed by the U.S.
7 Fish and Wildlife Service in considering its final
8 decision to remove the grizzly bear in the Greater
9 Yellowstone Ecosystem from the List of Endangered and
10 Threatened Wildlife.

11 A mailing and website address is also
12 available at the information table for additional
13 information and comments.

14 Members of the public will be given
15 three-minute slots for the duration of the public
16 hearing with a one-minute warning.

17 (Displaying the "1 minute left" sign.)

18 Smoking is not permitted in the Holiday Inn.
19 And if crowds are large, we must abide by the Fire
20 Marshal's recommendation for room capacity.

21 I will call speakers in the order in which
22 they are provided to me by the registration desk.

23 When you are called to present your comments,
24 please come forward to the microphone in front and
25 begin your presentation by stating your full name,

1 spell it for the record, and indicate if you represent
2 an organization.

3 Please face the table when you do that, even
4 though I'm facing you all, so that the court reporter
5 can very clearly understand what you are saying.

6 If you are reading your comments, please take
7 care to read them slowly enough for the court reporter
8 to understand. Also, if possible, please provide her a
9 copy of the comments you read.

10 Please keep in mind that the reporter will
11 not record any statements from the audience or
12 statements which are made to the audience. Comments
13 must be made directly into the microphone facing the
14 front of the room.

15 Instead of presenting oral comments here
16 tonight, or in addition to oral comments, you may
17 submit comments in writing. There are no limits on the
18 length of written comments.

19 Written comments may be submitted to the
20 staff at the registration table, or they may be
21 submitted by one of the following methods:

22 Electronically, you can go to the Federal
23 eRulemaking Portal, <http://www.regulations.gov>. In the
24 "Search" box, enter "FWS-R6-ES-2016-0042," which is
25 the docket number for this rulemaking. Then click on

1 the "Comment Now" button.

2 By hard copy, you can submit by U.S. Mail or
3 hand-delivery to: Public Comments Processing, Attn:
4 Docket No. FWS-R6-ES-2016-0042, U.S. Fish and Wildlife
5 Service, MS:BPHC, 5275 Leesburg Pike, Falls Church,
6 Virginia 22041-3803.

7 This information is also available at the
8 registration table just outside the room.

9 The U.S. Fish and Wildlife will not accept
10 email or faxes and will post all comments on the
11 regulations website.

12 We appreciate everyone's cooperation in
13 minimizing distractions. As this is a formal public
14 hearing and testimony only, we cannot allow questions,
15 comments, applause, jeers or demonstrations.

16 This hearing is scheduled to adjourn at
17 8:00 p.m.

18 Earlier today at this Holiday Inn, an open
19 house provided an opportunity for the public to ask
20 questions and to obtain additional information on the
21 Service's proposal. This hearing provides you with an
22 opportunity to provide testimony on the same subject.

23 Written comments submitted tonight or by
24 regular mail will receive the same review by Service
25 officials.

1 I would like to introduce Matt Hogan, Deputy
2 Regional Recorder in the Mountain-Prairie Region, and
3 Chris Servheen, Grizzly Bear Recovery Coordinator.

4 MR. HOGAN: Good evening, everyone. I'm Matt
5 Hogan. I'm the Deputy Regional Director for the Fish
6 and Wildlife Service based in Denver.

7 Chris Servheen, our Grizzly Bear Recovery
8 Coordinator, is standing there raising his hand.

9 So, thanks for everyone joining us tonight,
10 and a special welcome to those who joined us last night
11 in Cody and made the trip back up to Bozeman.

12 As Lesley said, the Fish and Wildlife Service
13 is proposing to remove the grizzly bear in the Greater
14 Yellowstone Ecosystem from the List of Endangered and
15 Threatened Wildlife.

16 The best scientific and commercial data
17 available indicates that grizzly bears in the GYE are
18 recovered and no longer meet the definition of
19 "endangered" or "threatened" under the Endangered
20 Species Act of 1973, as amended.

21 The GYE grizzly bear population is stable.
22 Threats have been addressed, and a post-delisting
23 monitoring and management framework has been developed.

24 We expect federal and state agencies to make
25 any necessary changes to their respective regulations

1 implementing that framework within the next several
2 months.

3 If this proposal is finalized, the grizzly
4 bear would be delisted in the GYE and future management
5 for this species, except in National Parks and National
6 Wildlife Refuges, would be conducted by the appropriate
7 state or tribal wildlife agencies.

8 We seek information, data, and comments from
9 the public about this proposal including the
10 post-delisting monitoring and management framework.

11 Again, thanks for joining us tonight, and we
12 look forward to your comments.

13 MS. TRAVERS: They are here to just listen to
14 your testimony and are not here to answer questions.
15 They will briefly summarize the proposal. After their
16 presentation, we will go over the instruction for
17 tonight's hearing.

18 Are there any questions related to the
19 procedure and ground rules before we begin?

20 (No response.)

21 MS. TRAVERS: If not, we will get started.

22 The first speaker is Dave Pauli.

23 MR. PAULI: Good evening. I'm Dave Pauli,
24 P-A-U-L-I, and I'm the Senior Advisor for wildlife
25 response and policy for the Humane Society of the

1 United States. And I have been a resident of Billings
2 for the last 31 years.

3 I thank you for this opportunity to speak on
4 behalf of my organization and our many supporters.

5 Delisting is premature. Clearly the
6 Endangered Species Act has done great things for GYE
7 grizzly bears since they were listed as threatened in
8 1975. There are as many as 5 to 600 additional bears
9 over a greater part of real estate since that time.

10 But, we don't think that that still is enough
11 of a safety margin to allow the grizzly bears to
12 persist and thrive without continued Endangered Species
13 Act protection.

14 We still have questions about the science
15 supporting the proposed rule. For example, the issue
16 of declining food resources, and especially questions
17 about the available appropriate high-quality food at
18 the right time of the year has not been satisfactorily
19 dealt with, nor has the potential impact of
20 human-caused climate change been adequately addressed.

21 Even the population estimate that is a key
22 criterion to delisting has been questioned by some
23 scientists and suggested as seriously overestimated.

24 Therefore, we're not convinced that the best
25 available science truly supports depriving GYE grizzly

1 bears of critical federal protection today.

2 Grizzly bears, as you know, once ranged from
3 northern Mexico to Alaska. Grizzly bears today, the
4 Lower 48, are a few small isolated populations. These
5 current locations of these populations cannot move
6 freely between populations and raises serious questions
7 about the lack of genetic viability.

8 Further, the potential future of trophy
9 hunting of the still vulnerable populations could lead
10 to a rapid directional selection and a breeding
11 population with even less genetic viability.

12 Therefore, we find it very concerning that
13 the proposed rules only considers bears in the current
14 population for habitat, the DMA, and bears outside that
15 area should also have delisting protection.

16 The Greater Yellowstone Ecosystem grizzly
17 bears still need federal protection to ensure that they
18 survive and thrive in the future. The Humane Society
19 of the United States and our supporters strongly urge
20 you to continue that protection and not adopt the
21 proposed rule, because delisting is premature.

22 Thank you very much.

23 MS. TRAVERS: Thank you.

24 Ashley Mills.

25 Ashley?

1 MS. MILLS: Ashea.

2 MS. TRAVERS: Oh.

3 Boy, I killed that one, huh?

4 MS. MILLS: That's okay. Not the first.

5 My name is Ashea Mills. I live in Gardiner.

6 As a 20-year veteran guide in Yellowstone, I
7 believe it is imperative that we keep grizzlies
8 listed.

9 There are serious concerns on how you come to
10 your conclusions about population data. It used to be
11 260 to 600 bears. Then it was with no net increase,
12 700.

13 In 2007, when counting methods changed, the
14 number nearly doubled, impossible with a slow-growing
15 population, but coincidentally, the year before
16 delisting was back on the table.

17 There may be 700 bears, but base population
18 data needs to be made available to trusted,
19 independent, qualified sources who don't have a stake
20 in the GYE who can be trusted with the geographic data
21 that you don't want made public, the National Research
22 Council comes to mind.

23 You insist we take the data at face value
24 without independent review, and that's just bad
25 science.

1 You say grizzlies are finding other food as
2 their historic food sources dwindle. But I don't
3 believe you have taken into account the variables with
4 other options, like caloric intake, quality and
5 availability of that food, or how much vulnerability or
6 human interface is required to get to them. The
7 "adaptable bear" is not a valid argument for
8 delisting.

9 After climate change, the second greatest
10 threat to the GYE and grizzlies is development.
11 Habitat fragmentation has perpetually increased the
12 isolation of this group of bears.

13 Why are GYE bears at risk for delisting and
14 hunting when the larger northern population is not?
15 Might it have to do with the incredible amount of money
16 and power behind the hunting lobbies, extractive
17 industries and trophy homes that are a constant threat
18 to our way of life, economies, wildlife habitat, and
19 wildness?

20 I believe it must, since there's other
21 reasons to delist only this population.

22 By delisting, you'll be responsible for
23 opening up at-risk habitat, losing essential and ever
24 more rare wilderness.

25 The grizzly acts as a shelter species for an

1 unknown amount of flora and fauna, some of which, like
2 the wolverines, deserve a discussion, but can't even
3 get the attention from you that they need.

4 The extinction rate globally is currently
5 1000 times faster than at any point in the
6 paleontological record. And as a matter of scientific
7 record, it is our fault. With a growing population,
8 and constantly less viable habitat, now is clearly not
9 the time to delist.

10 Grizzly protection also shelters my sanity.
11 To live and hike in griz country give me peace and
12 equilibrium in an ever more deafening society, and it
13 is irreplaceable.

14 I have been face to face with grizzlies on
15 several occasions, and it leaves my cells on fire and a
16 passion for life that you cannot buy.

17 I recently had a daughter. My decision to
18 have a child knowing what I know about the state of
19 affairs in the world today -- and my husband is a
20 climate scientist -- is directly tied to me raising her
21 in a place where wildness reigns, and the possibility
22 of a bear encounter keeps us on our toes. It is
23 enlivening and, for me, necessary.

24 If you delist, we will see a major drop in
25 population, already happening with a 6% decrease two

1 years ago, and 59 known dead last year, probably half
2 of the actual number -- due to hunting and pressure on
3 viable sows.

4 You will depress the already tenuous
5 genetics. You'll force us into paying millions --

6 MS. TRAVERS: Thank you. Thank you.

7 MS. MILLS: But then we will have lost
8 much --

9 MS. TRAVERS: Thank you. Thank you. Thank
10 you very much.

11 Thank you.

12 MS. MILLS: -- of their viable habitat.

13 MS. TRAVERS: Thank you.

14 Wayne Moore.

15 MR. MOORE: The goal for the grizzly recovery
16 was reached a number of years ago. Biologists say we
17 have over 1000 in the Yellowstone system. Another 1000
18 grizzlies in the Glacier Park area.

19 The grizzlies benefitted from the federal
20 protection, and now they should be transferred to the
21 states -- the management to the states of Wyoming,
22 Montana and Idaho. They manage their big game. We've
23 not heard any complaints about it, and there's no
24 reason that they wouldn't manage the grizzly bears as
25 well.

1 As far as the hype about the grizzly bears
2 not having enough to eat, I have lived in the grizzly
3 area. The signs start 30 miles from the house.

4 I spent five months every fall on grizzly
5 bear area. I've never seen a starving grizzly or a
6 sick grizzly.

7 If there is a small mass crop of nuts one
8 year, there's probably more elk and deer to eat.

9 Man is supposed to be the top of the food
10 chain. Well, if you're in grizzly country, you're
11 not. You're at their mercy.

12 27 bear encounters in Yellowstone last year.
13 One was a Park employee, and they killed and ate him.
14 There was a lot of people upset about putting that bear
15 down. If somebody shot your relative, you'd want him
16 put down, but why not a bear that kills and eats
17 somebody.

18 They're not afraid of man. There's no reason
19 for them to be afraid of man.

20 There's been 40 people killed by the bears
21 since 1970. 40. Six in the last five years, and
22 that's not counting all the people that were mauled.

23 When you walk into the Cody Basin, Sunlight
24 Basin, there's six signs that say, "Grizzly Bear
25 Country"; "Bears are dangerous"; "Hunt in pairs";

1 "Rifle shots attract grizzly bears"; "May come to gut
2 piles".

3 They're dangerous.

4 MS. TRAVERS: Thank you.

5 Mr. Grimes. Tom Grimes.

6 MR. GRIMES: My name is Tom Grimes,

7 G-R-I-M-E-S. I live in Sheridan, Montana.

8 Representing Montana Wild Sheep Foundation.

9 Montana Wild Sheep Foundation would like to
10 go on record as supporting the U.S. Fish and Wildlife's
11 proposal to delist the Greater Yellowstone grizzly
12 population.

13 Thank you so much.

14 MS. TRAVERS: Thank you.

15 Clarence Sanders.

16 MR. SANDERS: My name is Clarence Sanders. I
17 live here in Bozeman.

18 I oppose the proposed delisting.

19 Generally the proposal fails to consider
20 adequately the adverse impact of climate change on bear
21 habitat and bear ecology.

22 The Service has determined that the
23 Yellowstone bears are a distinct population segment,
24 which makes this proposal of even more critical
25 importance.

1 Climate change will reduce primary food
2 sources and reduce denning productivity of cubs for the
3 Yellowstone bears. Delisting will also increase
4 genetic isolation of this distinct population in the
5 Yellowstone region.

6 For these reasons, population numbers are
7 poised to decline, and the Yellowstone bear should not
8 be delisted.

9 But if they are delisted, there should be no
10 trophy hunting in the face of a likely declining
11 fertility rate of the Yellowstone region bears.

12 Thank you.

13 MS. TRAVERS: Thank you.

14 Mark Hufstetler.

15 MR. HUFSTETLER: Good afternoon. My name is
16 Mark Hufstetler. That's H-U-F, as in Frank, S as in
17 Sam, T-E-T-L-E-R.

18 I'm a resident of Bozeman, and have been here
19 since 1983. I'm speaking tonight as an individual and
20 as a representative of the Sierra Club with its
21 approximately 2400 Montana members and advocate, and
22 2.4 million national members and supporters.

23 I and the Sierra Club oppose the Service's
24 proposal to remove the Endangered Species Act
25 protections from grizzly bears in the Yellowstone

1 region at this time.

2 We believe that it's a real step backward in
3 grizzly recovery, because it allows the population not
4 to be maintained, but to be dramatically reduced from
5 where it is today, and because it keeps Yellowstone
6 bears on the artificial island that we have created
7 with these arbitrary political boundaries. Grizzlies
8 and other wildlife don't recognize or understand those
9 arbitrary boundaries.

10 The proposal today in front of us results in
11 all bears who are outside of those boundaries
12 temporarily, or permanently, to be managed at the
13 complete discretion of the states, and those bears will
14 not count at all towards the population estimate, and
15 as a result of this, they could be totally eliminated.

16 It really concerns me, because Montana,
17 Wyoming and Idaho have historically prioritized
18 maintaining large number of ungulates over the
19 conservation of native large carnivores, like grizzlies
20 and wolves.

21 I believe the grizzlies in Yellowstone region
22 need be able to connect with other populations of
23 grizzly bears in order to maintain genetic diversity,
24 primarily those in the northern Continental Divide
25 region near Glacier Park.

1 The arbitrary boundaries that I have talked
2 about will not allow for this to happen, and can reduce
3 the likelihood of any future connectivity patterns
4 being established through natural or artificial goals.

5 I think it's important that grizzly
6 connectivity be maintained both between Yellowstone and
7 the area near Glacier Park, as well as other regions,
8 such as the Kootnai in northern Montana as well.

9 There are no specifics in the plan that will
10 allow this to happen. There, in fact, will be
11 artificial population caps that will prohibit -- might
12 prohibit this from happening.

13 We haven't even seen the revised grizzly bear
14 management plans yet from Montana and for the other
15 states, and understanding that is critically important
16 to --

17 MS. TRAVERS: Thank you.

18 MR. HUFSTETLER: Thank you.

19 MS. TRAVERS: Thank you, sir.

20 Wendy Hergenracter?

21 MS. HERGENRAEDER: Hergenraeder.

22 MS. TRAVERS: Hergenraeder.

23 Sorry. I gave it a good shot.

24 MS. HERGENRAEDER: Good evening. My name is
25 Wendy Hergenraeder, H-E-R-G-E-N-R-A-E-D-E-R, and I'm

1 testifying as a Montana resident.

2 The Endangered Species Act has greatly
3 benefitted the Greater Yellowstone Ecosystem grizzly
4 bears. They have rebounded from as few as 136 bears,
5 when they were listed as threatened in 1975, to perhaps
6 in the hundreds today.

7 But grizzly bear populations in the U.S. are
8 neither recovered or sustainable. Today, wild grizzly
9 bears number at best between 1400 and 1700 bears in the
10 lower 48 states, and are not recovered over a
11 significant portion of their historic range, but in a
12 few small isolated areas.

13 Climate change and the loss of important food
14 sources are also a big concern, and connecting to other
15 grizzly bear populations is important for their
16 survival.

17 We have spent far too much time and effort
18 supporting grizzly bear recovery to then risk losing it
19 all with the possibility of trophy hunting.

20 As a native Montanan who visits Yellowstone
21 Park to see wildlife, and especially the grizzly bears,
22 I feel a huge injustice is being done to the American
23 people if bear management is handed over to the states
24 for hunting.

25 Tourists spend millions of dollars each year

1 in the Northern Rockies benefitting the local economy
2 of Montana. With the loss of its bears, Yellowstone
3 National Park could lose millions of tourism dollars
4 annually.

5 U.S. grizzly bears still need federal
6 protection to ensure they survive and thrive in the
7 future. Grizzlies are a valuable resource in Montana,
8 and we owe it to future generations to protect them.

9 Thank you.

10 MS. TRAVERS: Thank you.

11 Pat Simmons.

12 MS. SIMMONS: Pat Simmons from Bozeman.

13 S-I-M-M-O-N-S.

14 I am vehemently opposed to grizzly bear
15 delisting. I do not think your projections and
16 research are adequate.

17 You have not planned for the major decreases
18 that have and will continue to occur in whitebark pine
19 seeds, cutthroat trout and moths. Global warming,
20 insect infestations and lake trout have and will
21 negatively affect these sources of food.

22 This causes the grizzly to eat more meat.
23 Therefore, they are more likely to get killed by
24 humans, either because the humans entered their space,
25 or hunting of grizzly. Even hunters are more likely to

1 be in danger.

2 I oppose grizzly bear hunting, even though I
3 normally support big game hunting. Grizzlies are not
4 killed for food, but solely for trophies. This is a
5 disgusting human trait. Putting a beautiful wild
6 animal on one's wall in their house or their business
7 is pathetic.

8 Hunting is dangerous, even if hunting is for
9 elk and bison, as the bears may be accidentally in the
10 way of bullets if they are also hunting for elk and
11 bison. So might hunters and tourists get in the line
12 of sight accidentally. Tourists are not just inside
13 the Park boundaries.

14 Bears, along with wolves, are the most sought
15 after wild animals in Yellowstone and Teton by tourists
16 for viewing and admiring. The bears do not know the
17 borders of the Parks. Like Montana Fish, Wildlife and
18 Parks already allowed precious daily-watched wolves to
19 be killed by Montana hunters.

20 There are habituated bears, like No. 399, in
21 the Teton, who casually walk in and out of the Teton
22 and are loved by tourists. So, would you allow the
23 same slaughter of once-in-a-lifetime views of a
24 species, the grizzly, that aren't available for viewing
25 by the public anywhere else in the lower 48?

1 In addition, we desperately need grizzlies
2 like No. 399 who is clever, resourceful, adequately
3 protects the cubs from males, eats a variety of food,
4 is a great mother, who commonly has triplets raised to
5 adulthood. So, the population does grow.

6 Bears, who suddenly after 40 years become
7 hunted, will be naive about the change of laws and the
8 invisible borders.

9 You are creating a type of zoo totally
10 controlled by man, instead of allowing natural forces
11 and habitat expansion and human development to
12 naturally manage grizzly bears. And I'm concerned
13 about the state of Wyoming and their attitudes toward
14 wildlife.

15 So, in summary, I love all wild animals,
16 whether I see them or not. And we have an obligation
17 as humans to treat them in high respect, not some
18 number to manage for, and creating their untimely
19 deaths.

20 Thank you.

21 MS. TRAVERS: Thank you.

22 Tim Border.

23 MR. BORDER: Hello. My name is Tim Border,
24 and I live in Gallatin Gateway, Montana.

25 Border, B-O-R-D-E-R.

1 I am here today to oppose the delisting of
2 the Yellowstone grizzly. I believe now is not the time
3 to delist. There is much more that needs to be
4 addressed before it becomes open trophy season on these
5 magnificent animals.

6 I am a fifth generation Montanan whose family
7 has been in this valley for over 150 years. I was born
8 in Bozeman, and I have explored most of south central
9 and southwestern Montana over the past 35 years -- 55
10 years, excuse me.

11 Over those years, I have had the privilege of
12 viewing grizzlies in many different settings; one close
13 enough to require the use of pepper spray.

14 If I didn't see grizzlies, I encountered
15 signs of them in many places. I watched grizzlies feed
16 at the old open dumps near West Yellowstone before they
17 were closed.

18 During the years, I have crossed grizzly
19 tracks in the Gravelly, Tobacco Roots and the
20 Crazies. I no longer see signs of grizzlies in these
21 areas. They have been stopped in their efforts to
22 travel a corridor of connectivity to other grizzly
23 populations.

24 One vital connective corridor is the
25 Centennial Range west of the Park. It is one of the

1 very few mountain ranges in Montana that runs east and
2 west, making it an ideal path for grizzlies and other
3 wildlife to travel to areas further west, and over
4 time, Glacier and central Idaho.

5 These connections will help ensure a genetic
6 diversified Yellowstone grizzly population. This
7 interaction is critical to the long-term health of the
8 Yellowstone grizzly. Currently they are living on an
9 island devoid of new genetics.

10 The U.S. Experimental Sheep Station that
11 straddles this range must go before delisting the
12 grizzly.

13 Years ago, I came across a few sheep herders
14 in the Gravellyies that were in the process of disposing
15 a grizzly that had killed some of their sheep the
16 previous night. "Shoot, shovel and shut up" was code
17 of the West back then, and there is nothing to show
18 that this fact has changed. The dead grizzly recently
19 found on the Sheep Experiment lands reflects this.

20 As a hunter of 48 years, I find it obscene to
21 hunt these beautiful animals. Why are they hunted?
22 It's certainly not for the meat. Is it solely for the
23 sport of killing a grizzly with no regard for its soul
24 that makes one feel brave?

25 Many issues have not researched and have been

1 researched incorrectly regarding the delisting. Now is
2 not the time to delist. Now is the time to do proper
3 research.

4 Thank you for this opportunity.

5 MS. TRAVERS: Thank you, sir.

6 Elissa Chott.

7 MS. CHOTT: My name is Elissa Chott,
8 E-L-I-S-S-A; C-H-O-T-T, and I am speaking as a
9 representative of Great Bear Foundation.

10 The rule acknowledges the rapid decline of
11 whitebark pine, but rather than including it as one of
12 four important food sources for GYE grizzlies, as
13 stated in the 2007 rule, this current proposal merely
14 claims "it can be a significant food source", severely
15 emphasizing the role of whitebark pine has in a grizzly
16 bear's diet.

17 The Service's research found grizzly bears'
18 selection of whitebark pine seeds has declined since
19 2000, coinciding with whitebark pine population
20 declines reaching epidemic proportion, but the agency
21 fails to acknowledge the likely causal connection of
22 stark and rapid declines of whitebark park populations
23 being a limiting factor for grizzly bears using it as a
24 food source.

25 The proposal states one-third of grizzlies do

1 not have whitebark pine in their home range, but does
2 not elaborate to clarify if a lack of whitebark pine is
3 because the species does not grow in those regions, or
4 if those populations have been decimated by beetles and
5 blister rust, therefore, removing that vital food
6 source from the bear's diet.

7 We do not support delisting.

8 MS. TRAVERS: Thank you.

9 Josh Dickinson, with Kris Ellingsen to
10 follow.

11 MR. DICKINSON: Joshua Dickinson,
12 D-I-C-K-I-N-S-O-N, Forest Management Trust.

13 A personal note: When I was 15, a friend
14 invited me to do crow hunting. When I asked
15 permission, my father asked, "Are you going to eat
16 them?" I said, "No". He said, "Then you are not going
17 hunting."

18 What if I had asked to go grizzly hunting?

19 Last fall, I put a 2-point mulely and a
20 whitetail doe in the freezer, fulfilling my mythic
21 hunter's role as a provider for my family, while
22 practicing my favorite sport.

23 I question the moral and biological
24 appropriateness of killing a magnificent grizzly just
25 to have a trophy on the wall.

1 Moral? Some 35 tribes have passed
2 resolutions opposing the delisting of the Yellowstone
3 grizzlies, an animal considered a sacred symbol of
4 spiritual renewal.

5 Biological? It took decades for the
6 population to recover after being declared endangered.
7 While current numbers appear to be stable, a perfect
8 storm of threats already menace the Yellowstone grizzly
9 population.

10 These include, one, drastic loss of whitebark
11 pine due to bark beetle outbreaks, resulting in 1), the
12 loss of a major food source, especially for females
13 with cubs; and, b), greater human/livestock contact
14 compared to isolated whitebark pine forests which once
15 sheltered feeding bears.

16 Two, decimation of cutthroat trout as a food
17 source due to predation by lake trout illegally
18 introduced in Yellowstone Lake.

19 Three, incipient loss of high elevation
20 cutworm as a food source due to climate warming caused
21 habitat change.

22 Four, the shift to greater mammalian food
23 dependence by grizzlies, including elk, declining due
24 to hunting wolf and bear predation, bison spreading
25 beyond Yellowstone National Park, and livestock, with

1 resultant human conflict.

2 Why the rush to delist the grizzly?

3 Delisting of the grizzly appears to be a
4 political, not a scientifically based decision,
5 particularly given state bias favoring hunting.

6 Thank you.

7 MS. TRAVERS: Thank you.

8 Kris Ellingsen with Georgia Baker to follow.

9 MS. ELLINSEN: Hello, my name is Kris
10 Ellingsen. It's E-L-L-I-N-G-S-E-N. I'm representing
11 myself today.

12 I'm a resident right now of Gallatin Gateway,
13 but I'm a native of the Greater Yellowstone Ecosystem.
14 I was born in Jackson Hole. Grew up in Montana.

15 So, in short, compared to the native people
16 who were here before me, and the great bears who came
17 tens of thousands of years ago, I'm a relative
18 newcomer.

19 It's great news that we have perhaps about
20 700 bears in the ecosystem, but with success often
21 comes new problems, and the world has changed a lot
22 since 1975.

23 We have criss-crossed the land with roads and
24 fences that spell out, in rigid grids, our collective
25 ignorance about the needs of wildlife to move for what

1 they need.

2 Other people have talked about the loss of
3 whitebark pine and native cutthroat trout. I am very
4 concerned about that, and I consider us human beings to
5 have contributed to the climate change that is sweeping
6 the world.

7 I earned a bachelor's degree in zoology here
8 at MSU, and a master's in ecology. I understand that
9 population dynamics and species-level considerations
10 must contribute to the mosaic of information that
11 informs the U.S. Fish and Wildlife Department. But I
12 also believe that apex predators, we have to kind of
13 give ourselves mono vision, corrective vision with one
14 eye looking at the big picture, and the other close up
15 into the eyes of each of the animals that we attempt to
16 manage.

17 I'm speaking here of relationship, for each
18 bears as an individual, the same as you or me or your
19 children or your grandchildren.

20 In the wild, each bear we come into contact
21 will form an instantaneous here-and-now relationship
22 with us.

23 I have been lucky enough to have two
24 encounters with wild grizzly bears. I was absolutely
25 terrified and thrilled. My friends and I chose

1 nonconflict. So did the bears, and luck was with us.
2 If we open up bears to hunting, I'm concerned
3 about poaching, and I'm concerned about how hunters
4 will know for sure which bear is being shot - a
5 reckless youngster or the brain trust for generations
6 of cubs.
7 I am not a hunter, but I have many friends
8 who are ethical hunters, and I applaud hunters for
9 their role in conservation.
10 Nonetheless, I know what can happen in an
11 adrenaline-laced moment of decision. I grew up in
12 Billings. My sister was a classmate of Shannon
13 Weatherly, who was shot and killed while inside her
14 tent because two hunters mistook her tent for a bear.
15 I stand with Dr. David Mattson and his
16 findings about what is contributing to the appearance
17 of bears on the periphery of Yellowstone and Grand
18 Teton Parks. I stand with the 39 Tribal Nations who
19 also would not like to see the bears delisted. I am
20 asking for more time and understanding.
21 Please, no delisting at this time.
22 MS. TRAVERS: Thank you.
23 Georgia Baker, with Kelly Nokes up after
24 that.
25 MS. BAKER: Hello. My name is Georgia Baker,

1 B-A-K-E-R.

2 And I am a proud North American, having grown
3 up in British Columbia, Canada, and having lived in
4 Alaska and presently in Montana where I'm working to
5 advocate for the grizzly bear.

6 I am against the delisting proposal as per
7 Dr. Mattson. His information was very useful in
8 understanding the true picture of this region.

9 For me, and I believe a question that we
10 should all consider is the question, "Should the
11 grizzly bear remain a healthy part of Montana's natural
12 and cultural heritage?"

13 If we agree, then we need to strongly
14 advocate for continued state and federal protections
15 during this time of recovery and begin the work to
16 create a healthy and connective habitat for the Montana
17 grizzly bear.

18 The information I wish to share with you
19 today has been reported by the David Suzuki
20 Foundation.

21 I grew up with the TV series called "The
22 Nature of Things" with David Suzuki in British
23 Columbia, who has been the recipient of a long list of
24 Canadian and international awards.

25 In the Suzuki foundation report entitled, "A

1 Grizzly Challenge: Ensuring a Future for Alberta's
2 Threatened Grizzlies", it is reported that most
3 biologists believe grizzly bears are an essential part
4 of a healthy, fully functioning ecosystem.

5 Bears are termed as ecosystem engineers, or
6 keystone species helping to regulate prey species,
7 helping to maintain plant and the forest health.

8 Flourishing bear populations is a barometer
9 telling us that we have been good stewards of the
10 land.

11 The progress made in the Greater Yellowstone
12 Ecosystem has been applauded by the province of
13 Alberta, where the number of bears are diminishing at
14 an alarming rate. This is also because of human
15 pressure on remaining habitat, forcing bears into
16 fragmented populations, which leads to poor nutrition,
17 lower reproductive rates, and higher levels of human
18 conflict and human-caused mortalities.

19 The International Union for the Conservation
20 Nature guidelines, which Alberta uses, recommends that
21 wildlife populations should maintain more than 1000
22 mature, breeding adults to prevent unacceptable risk of
23 decline.

24 I think that people need to refer to the
25 nps.com [sic] bear safety page in order to prevent

1 humans from being injured by bears. It states
2 everything there.

3 Pepper spraying, for instance, stops
4 undesirable behavior by bears --

5 MS. TRAVERS: Thank you.

6 MS. BAKER: -- 92% the time.

7 MS. TRAVERS: Thank you.

8 MS. BAKER: Thank you.

9 MS. TRAVERS: Thank you.

10 Kelly Nokes.

11 MS. NOKES: Hi. My name is Kelly Nokes,
12 N-O-K-E-S.

13 I am an attorney in the Carnivore Campaign
14 League with Wild Earth Guardians. Guardians is a
15 nonprofit organization dedicated to protecting and
16 restoring the wildlife, wild places, wild rivers and
17 health of the American West. I share these comments on
18 behalf of our over 121,000 supporters across the West.

19 I first would like to thank you for the
20 opportunity to comment on the proposed rule. Our
21 organization will be submitting more thorough,
22 substantive comments in writing, and so I will direct
23 my comments to a few brief points here.

24 First, I would like to remind the Service
25 that their duty to recover imperiled species under the

1 Endangered Species Act is first and foremost to the
2 species and the desires of their national constituency.

3 I should not need to remind the Service that
4 a bipartisan Congress passed the ESA in 1973 in order
5 to provide a means whereby the ecosystems upon which
6 endangered and threatened species depend may be
7 conserved.

8 The Service is charged with implementing this
9 fundamental law, which was recognized by the Supreme
10 Court in TVA vs. Hill as intending to, quote,

11 "Halt and reverse the trend
12 towards species extinction
13 whatever the cost."

14 Despite the ESA's clear underlying framework,
15 which demands that the Service give the benefit of the
16 doubt to the species under both a precautionary
17 approach to endangered species protections, we feel
18 that the Service is choosing to derail a recovery story
19 on the brink of success in order to appease politically
20 powerful special interests.

21 We respectfully request that the Service halt
22 this premature rush to remove federal protections from
23 Yellowstone's grizzly bears.

24 Yellowstone bears play a key role in
25 increasing the necessary biodiversity of how attorneys

1 should rely.

2 Although Yellowstone's bears are making a
3 comeback, the Service's duty to recover grizzly bears
4 is far from complete. We fear that the Service's
5 proposed rule will hamper recovery efforts on the
6 whole.

7 For example, Yellowstone's bears have yet to
8 make the bio connection to Glacier's population, nor
9 have they had the chance to re-populate important,
10 suitable habitats, such as Selway Bitterroot recovery
11 zone. Grizzly bears remain absent from 98% of this
12 historic range.

13 In state management plans that effectively
14 reach and initiate firing line immediately upon
15 transfer from federal authority could prevent these
16 vital connections from ever taking place.

17 We respectfully caution the Service against
18 proceeding with the endangered species management based
19 primarily on political whim.

20 As Judge Christensen in the Federal District
21 Court in Montana recently reminded the Service in the
22 context of wolverines, quote,

23 "If there's one thing
24 required of the Service under the
25 ESA, it is to take action at the

1 earliest possible defensible point
2 in time to protect against the
3 loss of biodiversity within our
4 reach at a nation."

5 Second, I again remind the Service that their
6 decision to designate the Greater Yellowstone
7 population of grizzlies as a distinct population
8 segment for the sole purpose of delisting violates the
9 ESA and is contrary to existing case law.

10 As the courts have already told the Service
11 in the context of gray wolves,

12 "The creation of a DPS operates
13 as a one-way ratchet to provide ESA
14 protections."

15 And an unprotected DPS is an oxymoron.

16 As a brief summary of the statutory
17 requirements for changing the status of listed species
18 makes claim that --

19 MS. TRAVERS: Thank you.

20 Jerry Muething, and Marla Martin.

21 MR. MUETHING: Thanks for the opportunity to
22 comment.

23 My name is Jerry Muething, M-U-E-T-H-I-N-G.

24 I'm a resident of Belgrade from Cody,
25 Wyoming.

1 I support the science-based conservation and
2 management of grizzly bear populations in the Greater
3 Yellowstone Ecosystem.

4 The unbiased data clearly indicates that
5 population is recovered, and numbers are actually
6 stable to increasing.

7 In truth, bear populations are likely
8 exceeding the carrying capacity of the region, which
9 often leads to lower cub survival and sow production
10 rates.

11 Grizzly bears have demonstrated food
12 adaptability, actually increasing the population in
13 spite of the whitebark pine and cutthroat trout
14 declines in the region.

15 The goal of the Endangered Species Act is a
16 recovery of a listed species and not the listing status
17 into perpetuity because a species is deemed charismatic
18 by a segment of the population or the public.

19 The state wildlife agencies are staffed with
20 expert biologists that are highly capable of accepting
21 the science-based management of the population.

22 Managing grizzly bears for sustainability
23 will have minimal impact on the overall populations and
24 will boost local support and state funding for
25 sustainable bear management.

1 Thank you for the opportunity to comment.

2 MS. TRAVERS: Thank you.

3 Marla Martin, and Kiersten Iwai.

4 MS. MARTIN: Hello, my name is Marla Martin,
5 and I'm an individual living here in Bozeman, Montana.

6 Thank you for allowing me to speak tonight.

7 I would like to state that I oppose the
8 delisting of the grizzly bear from the Endangered
9 Species list as proposed by the Fish and Wildlife
10 Service.

11 I oppose the delisting simply because I value
12 the existence of grizzlies in the Northern Rockies
13 region.

14 I believe that the delisting is premature and
15 will drastically set back, if not negate altogether,
16 any efforts made to raise the population of these
17 creatures.

18 If they are taken off of the list, so is the
19 land the bears roam on, making it accessible for
20 logging and other resources extraction. This will make
21 it even more difficult for the grizzly to survive.

22 People come to Yellowstone and the
23 surrounding areas to see the wildlife, particularly
24 grizzly bears and wolves.

25 Now, I'm from Missouri. That's where I was

1 born and raised. Lived there for 24 years.

2 And Montana is awesome because we have things
3 like grizzly bears. So, I'm asking you that you rule
4 in favor of keeping these creatures on our lands for
5 generations to come and not delist them.

6 And I want that little girl that was here
7 earlier to be able to see them when she is older, as
8 well as her grandchildren.

9 So, thank you.

10 MS. TRAVERS: Thank you.

11 Kiersten, and Sharon Suthedand?

12 MS. IWAI: Hi. My name is Kiersten Iwai.
13 That's K-I-E-R-S-T-E-N. Last name I-W-A-I, pronounced
14 Iwai. And I'm a resident in Bozeman.

15 So, thank you for this opportunity to speak.

16 I would like to touch on the public process
17 of this comment period, and I'm only touching on two
18 points, but there's a lot more that I can speak to as
19 well.

20 Number one, we only have 60 days to comment
21 on the delisting of an iconic species from your first
22 National Park, Yellowstone.

23 This is an issue in which more than local
24 residents are interested in. The nation and the world
25 looks to this region for our wildlife.

1 60 days is not adequate enough to comment on
2 such a serious proposal, especially one that includes
3 many lengthy documents.

4 And point number two is that there are on
5 hearings in Bozeman and Cody, which I am grateful for,
6 and many people, as you can see, are grateful for as
7 well, but I'm puzzled why Jackson was excluded from
8 that. It's a gateway community with a significant
9 population of people and tourists.

10 And looking beyond the region, many around
11 the nation also care with grizzly bears, and their
12 voices need to be included as well.

13 So I thank those who were able to make to it
14 this hearing. There is one resident already from
15 Gardiner, and I know that there's some people from
16 Jackson who drove up as well.

17 And so I ask that the U.S. Fish and
18 Wildlife Service extend your comment period to more
19 than 60 days, and as well as opening up additional
20 hearings, such as in Jackson, so that the public can
21 adequately voice their opinion on this really important
22 and serious proposal.

23 Thank you.

24 MS. TRAVERS: Thank you.

25 Sharon? Sharon Sutherland from Belgrade, and

1 Clinton Nagel.

2 MS. SUTHERLAND: Good evening. My name is
3 Sharon Sutherland. That's S-U-T-H-E-R-L-A-N-D. And I
4 have lived in the Gallatin Valley for 32 years.

5 I saw my first grizzly bear almost that long
6 ago, and my most recent one last Saturday, and it was
7 just as much of a thrill then as it is now.

8 I am opposed to the delisting of grizzly
9 bears because I believe it is premature. The recovery
10 of the bears is a success story, but it is a precarious
11 one, and it would not take much for the population to
12 undergo a serious reduction, especially if hunting the
13 bear, which I adamantly oppose, happens.

14 One of the serious flaws of the plan is that
15 it allows the acceptable mortality rate for bears to be
16 exceeded for three years in a row before a review is
17 undertaken. And even then, re-listing may not be
18 required.

19 Grizzlies are present in only 2% of their
20 original range. We are fortunate to have them in
21 Montana, Idaho, and Wyoming.

22 I was in Yellowstone Park last week, and
23 despite the early season, people were there from all
24 over the country and all over the world, and to a
25 person, they wanted to see a grizzly bear. And

1 luckily, many of them did.

2 As others have said, there are too many
3 factors that puts the survival of the bear at risk in
4 the event of their delisting. They are slow-breeding.
5 Two of their food sources are in decline. There's no
6 connectivity between the greater Yellowstone population
7 and others, and no protection in the plan for bears
8 that roam out of the Park.

9 The population has pretty much been stagnant
10 for the last 10 years or so, and the number of bears
11 killed by human conflict has risen steadily to 63 in
12 2015.

13 More needs to be done to prevent conflicts
14 between bears and hunters and ranchers. More methods
15 of coexistence tried rather than lethal control. And,
16 that also is not included in the plan.

17 There is no allowance in the delisting
18 regulations for the protection of bears that live in
19 Yellowstone and Grand Teton, but wander outside the
20 Parks to forage or den.

21 Previously a speaker talked about bear 399,
22 who dens outside of Grand Teton. She's been seen by
23 millions. She's used to people. She would be a
24 sitting duck for hunters.

25 And can you image the publicity? I mean,

1 Cecil the lion would pale in comparison.

2 Additionally, the states of Montana, Wyoming
3 and Idaho do not have a great record when it comes to
4 managing a recently delisted species, as we have seen
5 with the gray wolf. We need to ensure the future of
6 this magnificent animal, and taking away the protection
7 of the Endangered Species Act is not the answer at this
8 time.

9 Thank you.

10 MS. TRAVERS: Thank you.

11 Clinton Nagel, and Glenn Monahan.

12 MR. NAGEL: My name is Clinton Nagel. It's
13 N-A-G-E-L.

14 I would like to read comments this evening on
15 behalf of the Gallatin Wildlife Association. The
16 Gallatin Wildlife Association is a non-profit volunteer
17 wildlife conservation organization representing
18 hunters, angler and other wildlife advocates in
19 southwest Montana and elsewhere. Our mission is to
20 protect habitat and conserve fish and wildlife.

21 GWA supports sustainable management of fish
22 and wildlife populations through fair chase, public
23 hunting and fishing opportunities to ensure that these
24 traditions are passed on for future generations to
25 enjoy.

1 We appreciate this opportunity to provide
2 additional comment to the ill-advised draft plan by the
3 U.S. Fish and Wildlife Service to delist grizzly bears.

4 We say "ill-advised" because the work of the
5 listing of the Endangered Species Act is not finished.
6 Yes, it is true that the population of grizzly bears
7 has increased, and their distribution has increased
8 since they were first listed, but there is more to
9 success than just population numbers and distribution.

10 We are concerned about the vitality and
11 viability of this species in the future. We are
12 concerned many want these bears delisted just to begin
13 hunting; that they see them as an economic asset
14 through trophy hunting.

15 There is much more at stake than this. To
16 us, success is when we see a species' ability to
17 survive in numbers and distribution, and increase and
18 maintain their genetic viability through natural
19 connective without man's manipulation or interference.

20 We don't see grizzly bears occupying only 2%
21 of their natural range and habitat as a success. We do
22 see that if these bears are delisted, you can kiss any
23 chance of connectivity good-bye.

24 There are many threats imposed upon grizzlies
25 which prevent them from having connectivity -

1 accidental deaths from automobiles, livestock grazing,
2 allotment shoots, justified and those not justified,
3 and so on, and so on. It is those bears who are most
4 likely to travel outside the protection of the
5 Yellowstone National Park; those bears that are more
6 likely to reach connective that will be shot.

7 For these reasons -- and there are more which
8 I can't go into this evening -- we strongly urge that
9 the delisting proposal be done away with. Let's at
10 least wait for another five years or so, so we can tell
11 if the population of the bear is increasing.

12 Because some scientists state that the
13 population numbers have flat-lined at best since 2006.
14 What's the hurry?

15 Thank you.

16 MS. TRAVERS: Thank you.

17 Glenn Monahan, with Roger Hayden after that.

18 MR. MONAHAN: Glenn Monahan from Bozeman.

19 M-O-N-A-H-A-N.

20 I agree with all of the comments regarding
21 food sources and climate change, declining habitat, and
22 how these will affect the grizzly in the future.
23 However, I'm not going to talk about that.

24 Mr. Hogan started off tonight with some
25 comments about how science is being used to back up

1 this proposal.

2 What I'm going to talk about tonight is not
3 science, but politics of the U.S. Fish and Wildlife
4 Service.

5 And I'm going to be reading some quotes
6 from a "High Country News" article that appeared on
7 October 9th, 2015. The title is, "Is Fish & Wildlife
8 under the thumb of political influence?"

9 So my comments today will deal with the
10 politics of the agency, and whether or not it has the
11 ability to actually function as a trusted manager of
12 precious wildlife.

13 Here are some comments from this article.

14 This is based on a study that was done by the
15 Union of Concerned Scientists, where Fish and Wildlife
16 Service employees were interviewed. These were some of
17 the conclusions from the study.

18 "Political interference and
19 a lack of scientific integrity
20 are influencing outcomes and
21 hampering the agency's work."

22 A majority of employees of the Service,

23 "... believe their office is
24 less effective than it was five
25 years ago."

1 "In addition to scientists'
2 over overwhelming indictment of
3 political influence at the
4 agency, many scientists identified
5 a lack of staff capacity and
6 resources to complete their jobs.
7 Further, more than half of the
8 surveyed Fish and Wildlife
9 researchers said the agency only
10 occasionally or seldom collects
11 sufficient scientific and monitoring
12 data to do its work..."

13 The survey also indicated concerns over,
14 "...accommodation of the states,
15 which potentially diminishes
16 science-based outcomes since
17 states may be more interested in
18 avoiding federal restrictions
19 than doing what's best for species."

20 Case in point, the Service recently declined
21 to list the wolverine as endangered despite the fact
22 that we have only 300 of these individuals left in the
23 entire United States.

24 Thankfully the courts gave the Service, of
25 couple of weeks ago, of a sound spanking for that

1 decision.

2 I submit to you that the Service is presently
3 in a dysfunctional state where science is suppressed
4 and ignored, and politics dominate.

5 And I don't believe that the Service is in a
6 position at this time or the condition where it is
7 capable of making sound decisions regarding the grizzly
8 bear.

9 We have reached a point in time where humans
10 so dominate this planet, that we manage everything.
11 And unfortunately, the Service, over the last several
12 years, has pretty much demonstrated --

13 MS. TRAVERS: Thank you, sir.

14 MR. MONAHAN: -- in managing species on the
15 brink of extinction.

16 MS. TRAVERS: Thank you, sir.

17 Roger Hayden, and then next would be Nancy
18 Schutz.

19 MS. SCHULTZ: Schultz.

20 MS. TRAVERS: Schultz.

21 MR. HAYDEN: Roger Hayden, Wyoming Wildlife
22 Advocates out of Jackson Hole.

23 Wyoming Wildlife Advocates believes removing
24 ESA protections from Yellowstone grizzlies is
25 premature.

1 Due to the increasing effects of climate
2 change and loss of critical food sources, these bears
3 are perhaps in their most vulnerable situation ever.

4 Since listed as threatened species in 1975,
5 the world of the Yellowstone grizzly has dramatically
6 changed. Two of its four main food sources have nearly
7 vanished because of warming temperatures, pine beetles
8 have infested and killed most whitebark pine trees,
9 which would produce nutritious nuts for grizzlies.

10 Native cutthroat trout is nearly gone from
11 Yellowstone Lake because illegally introduced
12 non-native lake trout has preyed on the nearly
13 wiped-out cutthroat.

14 Climate change will only worsen this
15 situation, and possibly compromise other food sources,
16 such as army cutworm moths.

17 Grizzlies have dispersed farther to the
18 periphery of their ranges in search of meat to replace
19 the loss of pine nuts and trout. This has led to the
20 increased conflicts, primarily with livestock and
21 hunters, and ultimately death for the bears.

22 For 2015, of record number of grizzly bear
23 deaths were reported. That would be 61.

24 When the unknown deaths are added, using an
25 official formula, the number of deaths could easily be

1 100. That's 14% of the population of 717 bears, and
2 unacceptable.

3 We need to do more to prevent conflicts, but
4 with states taking over management and adequate funding
5 far from guaranteed, I fear conflicts and deaths will
6 only increase.

7 The Fish and Wildlife Service needs to make
8 sure the states have in place adequate mechanisms to
9 ensure continued security for grizzlies.

10 After delisting, Montana, Wyoming and Idaho
11 have pledged to allow the bears to be hunted for
12 sport. This will only add to the annual number of
13 deaths. Can we afford that?

14 With the population growing very little and
15 mortalities increasing, we believe it is prudent to
16 wait a few more years to determine whether the
17 population is secure, sustainable and resilient enough
18 to withstand future changes.

19 Thank you.

20 MS. TRAVERS: Thank you.

21 Nancy Schultz, and then Seth Mangini.

22 MS. SCHULTZ: My name is Nancy Schultz,
23 S-C-H-U-L-T-Z.

24 I oppose delisting. I think it's premature.
25 I mean, this bear is an ancient bear. 80,000 years

1 it's been in this area.

2 You know, it is an island population. And I
3 agree with all of the comments about the grizzly, the
4 diet of the grizzlies, the Big 4 -- ungulates,
5 cutthroat trout, whitebark pine, army cutworm moths.

6 You know, ungulate numbers are down.

7 Cutthroat trout is in severe decline.

8 Whitebark pine is on a terminal decline.

9 Army cutworm moths are found mostly in the
10 alpine talus slopes in the southeast area of
11 Yellowstone Park and outside the Park to the
12 southeast. These alpine areas are predicted to have a
13 90% loss by 2099.

14 Now, with cutthroat trout or whitebark pine,
15 ungulate numbers down, army cutworm moths only in the
16 southeast areas, grizzlies are forced to turn toward
17 meat.

18 Eating meat is hazardous for grizzlies. It
19 brings them into more contact with humans, which means
20 more grizzly death.

21 The same number of bears inhabit a 30% larger
22 area. As they search for their dietary needs, they
23 have shifted toward meat. This meat shift is
24 especially dangerous for females, because it puts them
25 in competition with males for the same food source, and

1 males are larger. Males want to kill cubs to mate with
2 the females. Plus, meat is not the best food source
3 for the females to meet their reproductive needs.

4 Habitat changes, you know, diet, food effects
5 on bears, will not be immediate. The lag effect may
6 take 10 or 15 years.

7 Presently the population trend is flat to
8 downward. With the same number of bears occupying 30%
9 more area as they search for food, the long-term
10 population is up, but the recent trend is flat to
11 downward. Trend trumps size when other factors are
12 considered.

13 Population counts have factors that need to
14 be considered. For example, in the past when they were
15 feeding on whitebark pine, their numbers would have
16 been harder to spot. Now, with them on alpine talus
17 slopes, it is a much easier way to count. So, I think
18 the count might be skewed.

19 Another count method shows a slight decline
20 from 2000 to 2015.

21 So recommendations, you know, need to focus
22 on connectivity that is guided by sound principles
23 derived from the science of conservation biology.

24 The Centennials have been mentioned as an
25 east/west connectivity route, and the Gravellyies and

1 Tobacco Roots to the north.

2 If the grizzly is delisted, both of these
3 areas have livestock allotments, especially the
4 Gravelles had a large sheep allotment, and if
5 delisting comes, we will have more encounters, more
6 livestock --

7 MS. TRAVERS: Thank you. Thank you.

8 MR. SCHULTZ: Okay.

9 MS. TRAVERS: Seth Mangini.

10 MR. MANGINI: Hello. My name is Seth
11 Mangini. I live in Bozeman, Montana. M-A-N-G-I-N-I.

12 Thank you for the opportunity to speak
13 today.

14 I would like to express my concern in
15 opposition to the delisting of the grizzly bear in the
16 Greater Yellowstone Ecosystem at the present time.

17 While the bear has come a long way under
18 listing, I feel that delisting in being rushed in order
19 to satisfy political interests, exaggerated fears of
20 bear depredation in ideological opposition to the
21 Endangered Species Act itself.

22 The overarching objective of wildlife
23 management should be, "Will a given policy solidly
24 improve the state of a given wildlife population?"

25 If the answer is not a resounding "Yes", then

1 the policy is probably not a good idea.

2 Delisting will result in an increase in the
3 number of bears killed every year and a reduction in
4 their range. In addition, it will reduce the
5 scientific oversight of the population and fragment
6 management of a single population among three state
7 wildlife agencies, not all of whom have the best
8 interest of the bears at heart.

9 In the past five years since wolf delisting,
10 Wyoming has demonstrated a tremendous difficulty in
11 putting forth a policy that meets the Endangered
12 Species Act. And I fear that the same causes that have
13 caused this will make it difficult to manage grizzly
14 bears.

15 The Yellowstone grizzly exists in genetic
16 isolation from other populations, and it can only
17 achieve long-term viability when it gains the ability
18 to exchange genetics with other populations in the
19 north.

20 Management to expand the territory occupied
21 by the bear to link with other populations should be a
22 key metric, along with population, on which we judge
23 the success or failure of recovery.

24 As such, hunting can be especially dangerous
25 to the long-term viability of the bear population, and

1 it is just about inevitable under delisting.

2 Grizzly bears evolved without predation
3 pressure, and as so, they evolved a low birth rate. As
4 such, they are ill-suited to survive in the face of
5 sport hunting as demonstrated by their catastrophic
6 population crash during the previous two centuries.

7 Hunting is unlikely to help prevent human
8 bear conflict by giving bears a greater fear of humans,
9 as the current largest source of bear mortality is
10 already killing by humans.

11 In addition, there's a lack of scientific
12 evidence that it is possible for animals such as bears
13 to adjust their habits in the face of hunting in the
14 same manner as more social animals, such as deer and
15 elk.

16 According to Swensen in 1999, the
17 construction of such an experiment to determine
18 something like this is virtually impossible in the
19 wild.

20 Wild grizzlies can be frightening animals in
21 a one-on-one encounters. In reality, they are no
22 competition for humans.

23 MS. TRAVERS: Thank you.

24 Okay, at this time, we're going to take a
25 10-minute break. We are off the record.

1 (Whereupon, a short recess was taken.)

2 MS. TRAVERS: Back on the record.

3 Don Butchman and Andrea Santarsiere.

4 Don? Andrea?

5 MS. SANTARSIERE: I'm Andrea.

6 MS. TRAVERS: Come on up.

7 MS. SANTASIERE: Hi. My name is Andrea
8 Santarsiere, S-A-N-T-A-R-S-I-E-R-E.

9 I'm a staff attorney with the Center For
10 Biological Diversity based in Victor, Idaho.

11 The Center is opposed to delisting grizzly
12 bears in Yellowstone for a number of reasons.

13 First, we do not believe it is appropriate to
14 designate a distinct population segment for purposes of
15 removing federal protection.

16 At least one court has agreed that this is
17 inconsistent with the language of the ESA, and yet the
18 Fish and Wildlife Service still insists on pushing
19 forward with this delisting proposal on those grounds.

20 It is incomprehensible why the agency doesn't
21 spend time and precious funding on racing forward with
22 the delisting rule while pending litigation may affirm
23 that this process is illegal.

24 Second, rather than taking a piecemeal
25 approach to recovery and delisting, we believe that

1 Fish and Wildlife Service should be recovering grizzly
2 bears and more of their historic range.

3 Right now, grizzly bears only occupy 2% of
4 their historic range in the lower 48 states, and there
5 is plenty of remaining suitable habitat where bears can
6 and should be recovered.

7 For example, the Selway-Bitterroot in central
8 Idaho is listed as one of six necessary recovery areas
9 for grizzly bears, yet when we petitioned for Fish and
10 Wildlife Service to push forward with its original
11 proposal to reestablish a population there, Fish and
12 Wildlife said it did not currently have the time or
13 funding to do so.

14 Establishing a population in this area could
15 provide crucial connectivity options for bears in the
16 Yellowstone region which face genetic health challenges
17 now and in the future.

18 The current proposed rule does nothing to
19 protect connectivity corridors which could possibly
20 allow for genetic exchange between bears in Yellowstone
21 and bears to the north and west.

22 By creating arbitrary boundaries outside of
23 which bears are not protected, which is highlighted by
24 Wyoming's draft plan, stating they will manage areas
25 outside of the DMA as unsuitable for grizzly

1 occupation, delisting essentially ensures that the
2 Yellowstone grizzly will remain forever isolated.

3 Finally, we believe the numbers this year
4 prove delisting is premature. The population has been
5 stable or declining for over a decade, and this year,
6 the population dropped substantially. Moreover, this
7 year, we have seen the highest number of mortalities
8 since the recordkeeping began, many of which are "under
9 investigation" with no hint as to how these bears were
10 killed.

11 Finally, I'd like to express my surprise and
12 disappointment that no public hearing has been
13 scheduled in Jackson.

14 The town of Jackson is on the doorstep to
15 Grand Teton National Park. The majority of tourists
16 that visit Yellowstone National Park travel through or
17 stay in Jackson at some point in time.

18 The big failure to hold a hearing there
19 undermines the public process, and we would ask Fish
20 and Wildlife to reconsider adding a public hearing
21 there.

22 Thank you.

23 MS. TRAVERS: Thank you.

24 Don Bitchman. Dan Sullivan.

25 MR. BACHMAN: My name is Don Bachman,

1 B-A-C-H-M-A-N.

2 I am opposed to delisting at this time.

3 Progress has been made toward recovery, no doubt of
4 that, since the Seventies, but mortality last year I
5 believe was 59 bears that were killed by various means,
6 and some unknown.

7 The genetic population expansion beyond the
8 designated management area has not been achieved. I
9 believe the connectivity is essential for continued
10 population stability and growth.

11 The logical east/west mountain range of the
12 Centennial peaks between Montana and Idaho is a logical
13 connectivity topographic area.

14 Currently, much of that area is under the
15 management of the Agricultural Research Service, sheep
16 research station, and that is an impediment toward the
17 connectivity potential of grizzly bears.

18 There's a suggestion that I make that the
19 Interagency Grizzly Bear Committee, soon to be convened
20 under another title, should represent Fish and Wildlife
21 Service representatives from Red Rocks National
22 Wildlife area, which is at the base of the Centennial
23 Mountains and on the connectivity path.

24 Thank you.

25 MS. TRAVERS: Thank you.

1 Dan Sullivan, and Rachelle Moeller.

2 MR. SULLIVAN: My name is Dan Sullivan,
3 S-U-L-L-I-V-A-N.

4 I'm from Livingston, Montana.

5 Thank you, Fish and Wildlife Service, for all
6 the biology that you put together over the last few
7 years, but I'm afraid it's not going to be good enough
8 to support anything the likes of a trophy hunt.

9 I think you have done a great disservice to
10 the public by even suggesting that this is a
11 possibility.

12 And going through the Federal Register and
13 reading fairly thoroughly, you've heard a lot from the
14 public here about -- a very well-educated public, I
15 might add, thanks you to -- but you don't inspire
16 confidence in the public now when you propose things
17 such as delisting.

18 It's it so woefully deficient, that I don't
19 even know where to begin.

20 We've heard a lot about the declining food
21 sources. We've heard about carrying capacity,
22 excessive -- unsustainable mortality, genetic
23 viability, scientific accountability.

24 We don't get to see any of the raw data. How
25 can you expect the public to trust you when you don't

8 I just want to read a quote from the Federal
9 Register. The says,

10 "Climate effects: The effects

11 of climate change may result in

12 a number of changes to the grizzly

13 bear habitat, including a reduction

14 in snowpack levels, shifts in denning

15 time, shifts in the abundance and

16 distribution of some natural food

17 sources and changes in fire regimes.

18 Most grizzly bear biologists in the

19 United States do not expect habitat

20 changes predicted under climate change

21 scenarios to directly threaten grizzly

22 bears."

23 That's really pretty astonishing.

24 And the last sentence in the climate change

25 subtitle in the review is,

1 "Therefore, we conclude that
2 the effects of climate change do
3 not constitute a threat to the
4 Yellowstone grizzly bear now, nor
5 are they anticipated to in the
6 future."

7 I think you're going to have to go back and
8 rework that one. That is an extraordinarily powerful
9 statement to the make in the face of climate change,
10 which we hardly understand how it affects us.

11 So, our beloved grizzly bear is going to be
12 the canary in the mine for your mistakes? You're going
13 to have to go back and begin again, just as you have to
14 do with the wolverines.

15 These mistakes are just unconscionable. And
16 we would like to help you. We're here to help you. We
17 want to.

18 Let's get together on this. Let's work
19 together. We want to save the grizzly bear. We want
20 to save the habitat. We want to save as much as we
21 possibly can. But we can't do it when you won't help
22 us and work with us by sharing the science, sharing
23 your thoughts --

24 MS. TRAVERS: Thank you, sir.

25 Rachelle Moeller and Jerilyn Lessley.

1 MS. MOELLER: Hi. My name is Rachelle
2 Moeller, R-A-C-H-E-L-L-E; M-O-E-L-L-E-R.

3 I am a native Montanan. I have lived here
4 all of my life.

5 And I'm opposed to the delisting, mainly
6 because there's not enough research that has been
7 done.

8 I feel there needs to be more done, and I
9 find it really funny that this is taking place during
10 an election year. It seems much more politically
11 driven than scientifically driven.

12 Being a native of Montana, this is a huge
13 area that attracts people from around the world who
14 want to see wildlife. Montana is known for its
15 wildlife.

16 I have numerous friends that have come here
17 from other countries, other states, fall in love with
18 Montana and never leave because they love it so much
19 because it is the last best place. It is the last part
20 of wild, and the grizzly bear is a huge iconic figure
21 when it comes to wildlife.

22 And I just feel that before you can even
23 really think about delisting them, there needs to be
24 more research. There needs to be more science put into
25 it instead of politics and money.

1 So, I just hope that what goes on tonight
2 really is taken to heart, and you really start thinking
3 about more of the science of it rather than being
4 political and driven by money.

5 Thank you.

6 MS. TRAVERS: Thank you.

7 Jerilyn Lessley, Derek Goldman.

8 Michelle Uber --

9 MR. GOLDMAN: I'm sorry, I was waiting for
10 the person before me.

11 My name is Derek Goldman, G-O-L-D-M-A-N. I'm
12 the Northern Rockies representative with the Endangered
13 Species Coalition. I'm in Missoula.

14 The ongoing recovery today of the grizzly
15 bear is amazing Endangered Species Act success story,
16 and another example of the effectiveness of the
17 Endangered Species Act and how it works to protect and
18 recover species on the brink of extinction.

19 Nevertheless, we have numerous areas of
20 concerns about the delisting rule.

21 It's difficult to comment on the conservation
22 strategy and the rule given that we are still waiting
23 for a multitude of other documents that are contingent
24 upon delisting that we haven't seen yet, including
25 several state plans.

1 But, I will be commenting more in writing,
2 but I will just briefly outline of area of concern we
3 have.

4 First of all, connectivity. We appreciate
5 the language and the discussion in the delisting rule
6 about the need for connective. But, of course, the
7 devil is going to be in the details. We think
8 connectivity is important both for the GYE.

9 To date, there has yet to be a bear that has
10 arrived from the Northern Continental Divide into the
11 GYE.

12 We also think GYE connectivity outgoing is
13 important, as it looks like it might be one of the best
14 ways to pursue grizzly bear recovery in the
15 Selway-Bitterroot Ecosystem.

16 Secondly, we're also concerned about grizzly
17 bear occupancy and habitat. Particularly we're
18 concerned about the demographic monitoring area and the
19 relatively small portion of the entire ecosystem where
20 grizzly bears and grizzly bear mortalities will be
21 counted toward mortality thresholds.

22 It seems like if we're saying an entire
23 ecosystem has recovered, then grizzly bears, the
24 mortalities should be counted everywhere.

25 We are also concerned about the habitat

1 protections and how grizzly bears will be managed in
2 the different areas where different protections are.

3 Thirdly, hunting. We don't believe it is
4 necessary that there's a management need for hunting,
5 and it shouldn't allowed.

6 A big concern of ours is continued funding
7 for grizzly bear conservation and monitoring moving
8 forward: The grizzly is a sensitive species and will
9 always need conservation.

10 Finally, the posted delisting monitoring
11 period, we feel is incongruent with the life history
12 and biology of a species like the grizzly bear and
13 should be at least tripled in length.

14 And then finally, the creation of a DPS
15 causes us concern about what the future of the
16 Department is towards recovery the other five recovery
17 zones.

18 And we will comment more details on these
19 areas in writing.

20 Thank you.

21 MS. TRAVERS: Thank you.

22 Michelle Ubernaga, and Amanda Kimmel.

23 MR. UBERUAGA: Hi. My name is Michelle
24 Uberuaga, and it is spelled U-B-E-R-U-A-G-A.

25 Do I get extra seconds?

1 (General laughter.)

2 I'm the Executive Director of the Park County
3 Environmental Council based out of Livingston, Montana.

4 First, I want to thank everyone for being
5 here today, for holding this hearing and for all the
6 community members who stood up and spoke.

7 PCC will also submit formal comments, but I
8 wanted to take the opportunity to share concerns I'm
9 hearing in our community.

10 PCC is a grassroots group with about 800
11 members. Park County sits on the north border of
12 Yellowstone National Park and includes the gateway
13 communities of Gardiner and Cooke City.

14 We are blessed to live and work in a
15 one-of-a-kind ecosystem, the Greater Yellowstone
16 Ecosystem.

17 Grizzly bears and Park County residents share
18 the wild places in our community and demonstrate that
19 people and wild animals can coexist, and to the benefit
20 of both.

21 We believe grizzly bears need ongoing
22 protection under the Endangered Species Act to continue
23 to have that type of community.

24 We are a small grassroots group, but we are
25 stewards of a spectacular place. PCC's online comment

1 for opposing delisting has garnered more than 110,000
2 people from across the country. This is because people
3 all across the country in the world care about grizzly
4 bears.

5 So, I want to share kind of the primary
6 concerns I'm hearing in the community about delisting.
7 One is that grizzly bears within Yellowstone National
8 Park should be allowed to safely wander outside the
9 Park's border.

10 Ashea, who was here, Ashea Mills -- thank you
11 for your comments -- a community member in Gardiner
12 represents the local economy that thrives because of
13 grizzly bears and tourists that visit from all around
14 the world to see those bears.

15 Park County residents also include some of
16 the world's leading grizzly bear experts, and those
17 scientists have not been given an adequate amount of
18 time to review and to respond to the delisting rule, so
19 we're also asking for more time.

20 We formally made that -- asked in a letter to
21 Fish and Wildlife Service. I want to make that again
22 on behalf of the scientists in our community and on
23 behalf of the citizens in Park County so that everybody
24 can be given an adequate amount of time to give their
25 comments and to learn more about the process.

1 They also believe a public hearing like this
2 is fabulous, and if you could do the same for Gardiner,
3 that would mean the world to local community.

4 But because it is a national issue, I think
5 that meetings in Denver and Boise are also probably
6 important.

7 So, just to close, I am really concerned. I
8 think the biggest concern is climate change, which is
9 probably the most significant challenge of our
10 lifetime. And all of our planet's species face the
11 unknown challenges of climate change, especially
12 grizzly bears.

13 MS. TRAVERS: You.

14 Amanda Kimmel.

15 And I know a couple of people said no - Sue
16 Mills, John Mills, Mike Wright, Roger Singer, Richard
17 Hay all said no.

18 Has anyone changed their mind?

19 (No response.)

20 MS. TRAVERS: They are still no?

21 Okay.

22 All right. Thank you.

23 MS. KIMMEL: Hi. My name is Amanda Kimmel,
24 K-I-M-M-E-L.

25 I'm a native of Montana. I live in Belgrade,

1 and I'm just speaking as a resident, just growing up in
2 Montana.

3 So, all of the research I've seen since the
4 year 2000, the grizzly bear population, since it has
5 increased since 1975, it has been stagnant since early
6 2000. It's actually declined 6% last year.

7 So, I just really question the research
8 involved with coming up with this decision. I think
9 the delisting is premature, and it needs to be thought
10 out a little bit more.

11 And I thank you for this opportunity to
12 speak. Thank you.

13 MS. TRAVERS: Thank you.

14 Randy Newberg and Stacy Philbrick.

15 MR. NEWBERG: My name is Randy Newberg, and
16 I'm from Bozeman.

17 I'm one of five people that was appointed to
18 sit on the Governor's Grizzly Bear Roundtable that
19 drafted this conservation strategy in conjunction with
20 the U.S. Fish and Wildlife Service.

21 I have been involved in this since the
22 conservation strategy started. I have read it front,
23 back, everything in between it.

24 And it's interesting to hear the comments
25 today. Very similar comments to what was brought

1 before the Governor's Roundtable as we drafted this
2 conservation strategy.

3 I'm pretty sure that no matter what decision
4 U.S. Fish and Wildlife Service comes to, this will be
5 another environmental attorney full employment act. No
6 one will be satisfied with whatever you decide.

7 But I want to say that in three years of
8 working on that Roundtable, the best grizzly bear
9 biologists in the world are involved in this study
10 team.

11 This plan has considered every topic you have
12 heard here today. This plan was put together to
13 accomplish the objective of making sure that the
14 grizzlies were not threatened.

15 And in the event of state turnover, or state
16 control, incentives were given to the state, if you
17 read the plan, to have them manage for the current or
18 even higher populations, and disincentives were
19 provided for anything the states would do to manage for
20 lower populations.

21 So, the whole idea that somehow this is going
22 to get turned over to the states is going to be the
23 dead last during the train wreck. There's even a
24 further safety net that says if the population numbers
25 get to a certain level, we have re-listing.

1 All this really comes down to a deal that was
2 struck. The three governors signed a Memorandum of
3 Understanding with the U.S. Fish and Wildlife Service.

4 If you look at what has happened within the
5 PCA, the Primary Conservation Area, the habitat
6 securities, the changes in roads, the changes in travel
7 patterns, the changes in so many things, the locals
8 here have made a serious contribution both in their
9 changed behavior and in their financial commitment of
10 the state's funding most of the state research -- the
11 hunting community funding the state research on grizzly
12 bears.

13 You, coming forward with this ruling, are
14 keeping your end of the deal. Unfortunately, a lot of
15 people are here asking you to break that deal. They're
16 asking you to not hold up the deal that was struck.

17 And to this point, what we dealt with was a
18 wildlife experiment. If you do not continue honoring
19 the agreement that was struck 15 years ago this,
20 becomes a social experiment.

21 Quite honestly, I'm not that excited about
22 being a continued lab rat in the social experiment that
23 some are asking you to conduct here.

24 So, with that, thank you for listening. And,
25 obviously I support your decision.

1 MS. TRAVERS: Thank you.

2 Stacy Philbrick and Jim Laybourn.

3 MS. PHILBRICK: My name is Stacy Philbrick,
4 P-H-I-L-B-R-I-C-K.

5 I'm from the Bitterroot here in Montana, and
6 I'm here representing Montana Sportsmen for Fish and
7 Wildlife. We are a nonprofit grassroots sportsmen's
8 group who support hunting, fishing, trapping, and
9 landowner rights.

10 We would like to go on the record that we
11 support this proposal to delist GYE grizzlies. We also
12 support state wildlife management, management of all
13 wildlife, including grizzlies and the potential or
14 eventual hunting of grizzlies as a management tool.

15 Delisting grizzlies is a sign of success,
16 much like with the wolves. And hunting, trapping of
17 wolves over the past few years has done nothing but
18 help their numbers. They're stable and fine.

19 I think species like the grizzly is not going
20 to see that hunting tool as management any time very
21 soon, so I think a lot of that fear could be relaxed.

22 And the species, just a reminder to people,
23 that species that's listed on the ESL are not ever
24 intended to stay there for perpetuity.

25 Thank you.

1 MS. TRAVERS: Thank you.

2 Jim Laybourn and Linda Weydeveld.

3 MR. LAYBOURN: I am Jim Laybourn,

4 L-A-Y-B-O-U-R-N.

5 I'm a resident of Moran, Wyoming, and I'm a
6 big game hunter.

7 And I hunt a lot for meat, but I would never
8 trophy hunt a grizzly bear. And I think the whole
9 concept is abhorring.

10 I support the very thoughtful comments of
11 previous speakers who have supported continued
12 protection of the grizzly, especially regarding climate
13 change, connectivity and concerns about objectivity by
14 the U.S. Fish and Wildlife Service.

15 As a resident of Moran, Wyoming, I was
16 extremely disappointed that the U.S. Fish and Wildlife
17 Service has decided to ignore my community and is not
18 scheduling a meeting in Jackson Hole.

19 Perhaps this is because of the extremely
20 strong support for the grizzly bear in my valley that
21 the Service has decided to make it more difficult for
22 my friends and neighbors to show support for continued
23 protection of the animal that is so immensely important
24 to the Greater Yellowstone Ecosystem and to our
25 regional tourism economy.

1 In fact, it is the huge economic importance
2 of the grizzly bear that keeps compelling me to attend
3 all these meetings and speak up for continued
4 protections, because in spite of the well-documented
5 significance of grizzlies to regional tourism, it is
6 rarely acknowledged in official documents or plans.

7 The 2014 paper on the economic importance of
8 roadside bears makes it clear that tens of millions of
9 dollars of grizzly bear tourism is at stake by
10 delisting and trophy hunting on the boundaries of our
11 National Parks.

12 I believe that in spite of ITBC attempts to
13 convince the public that declining food sources are not
14 an issue, they absolutely are, and that decline is the
15 key to the reduced carrying capacity of the Greater
16 Yellowstone Ecosystem's grizzly habitat.

17 The critical food source declines and
18 dispersal from the core habitat shows the absolute
19 importance of the primary conservation area of the
20 population.

21 Whitebark pine are in serious trouble, and
22 the cutthroat trout will never recover to the point
23 where it is once again a significant part of their
24 diet.

25 It's time to ramp up protections of the PCA

1 and permanently ban grizzly bear trophy hunting,
2 clear-cut log and oil and gas development and mining
3 from all of the public lands in the Primary
4 Conservation Area.

5 If the PCA has been critical to the recovery
6 of the grizzly bear since the Eighties, then it will
7 always be critical habitat, and the grizzly bear should
8 not be delisted until there's a legal agreement to ban
9 grizzly bear hunting inside the Primary Conservation
10 Area and to end resource extraction.

11 The grizzly bear has not been restored to an
12 adequate percentage of its historical range to meet the
13 definition of "recovered" under the ESA.

14 The rush to delist the grizzly for political
15 expediency is short-sighted and ignores the wishes of
16 the majority of Americans who want the bear to remain
17 protected under federal law.

18 The current mortality levels are
19 unsustainable, and the population, while currently
20 stable, cannot withstand the combined losses of current
21 mortality and trophy hunting.

22 MS. TRAVERS: Thank you.

23 MR. LAYBOURN: I'll submit further comments
24 in writing.

25 MS. TRAVERS: Kat Brekken, Dan Freund.

1 Stephanie Adams, you said no. Are you
2 interested?

3 MS. ADAMS: I still say no.

4 MS. TRAVERS: Okay. Thank you.

5 MS. BREKKEN: Hi. I'm Kat Brekken. That's
6 K-A-T; B-R-E-K-K-E-N.

7 I'm a resident of Gardiner. I'm a homeowner
8 in Gardiner, and I reside there because I work in
9 Yellowstone.

10 I work reservations. I take phone calls from
11 people from all over the world, and they're already
12 talking about what's going on here today.

13 We're hearing from people, residents, as well
14 as guests, coming to visit Yellowstone that are
15 concerned about whether they're going to see a bear or
16 not. They're asking about bears and wolves.

17 They are not asking about the geyser. They
18 are asking about the wildlife. They're coming to spend
19 millions and millions and millions of renewable
20 resource dollars in our Greater Yellowstone Ecosystem.

21 And they can't be here to speak. They have
22 less than 60 days to make a comment. We've yet to see
23 all the data regarding the comment in order to make an
24 educated statement about, and that is not acceptable.

25 I oppose the delisting of the grizzly bear,

1 not only for myself, for my guests, for my family
2 that's been a homesteading family in this area since
3 the 1850s.

4 I've watched what's happened to the bear
5 here. I've seen what happened to the wolf.

6 Right now, Wyoming is talking about \$6,000
7 for an out-of-state bear tag; \$600 for a resident bear
8 tag to put monies in the coffers of Fish and Wildlife
9 Services.

10 Already the nonconsumptive public has gone to
11 bat offering a wolf stamp in the state of Montana,
12 which was struck down by the hunting community.

13 We are more than able to help sustain and
14 peacefully coexist and finance the protections that
15 need to be continued for the bear, as well stated by
16 all the knowledgeable people who have spoken today
17 opposed to the delisting.

18 We have economic reasons. We have
19 environmental reasons. We have biological reasons. We
20 have nonconnectivity reasons. And just like
21 inner-breeding within any species in an island
22 biodiversity, eventually that biodiversity will
23 collapse. We will see problems within our species.

24 And right now, we are at the sixth extinction
25 addressed by science in this world. It is not a time

1 to come up with a delisting proposal with only three
2 years of study that is an opaque study, not presently
3 available to the public, nor is it appropriate to only
4 allow 60 days for comment.

5 I respectfully thank you for allowing
6 opinions and your time. Thank you.

7 MS. TRAVERS: Thank you.

8 Dan Freund and Elise Strong.

9 I know you said no, Elise. Are you still a
10 no?

11 MS. STRONG: Still a no.

12 MS. TRAVERS: Okay.

13 Josiah Utsch.

14 MR. UTSCH: Utsch.

15 MS. TRAVERS: Utsch, okay.

16 Josiah, yeah, come on up.

17 MR. UTSCH: All right.

18 Jeanne Wilkinson?

19 MS. WILKINSON: Yes?

20 MS. TRAVERS: You're next.

21 MR. UTSCH: Well, I --

22 MS. TRAVERS: Spell your last name, please.

23 MR. UTSCH: U-T-S-C-H. It's pronounced
24 Utsch.

25 Sorry, I'm nervous. This is my first time

1 for this.

2 MS. TRAVERS: That's okay. We don't bite.

3 MR. UTSCH: Well, today, I'm just here to
4 talk about the grizzly bear. I'm here to represent my
5 generation.

6 And I'd just like to say that I think the
7 majority of me, my family, my friends, my peers all
8 agree that the grizzly bears are a magnificent creature
9 that needs protected.

10 And I think the situation right now is very
11 comparable to a virus that I just recently contracted.
12 I had a terrible fever for about a week, and just as I
13 barely recovered, I got another terrible cold that I
14 still have today.

15 And I feel like that's the same situation
16 you're going to get with the grizzly bear. You get
17 just at the peak of recovery, and then you're just
18 begging for some sort of accident, proverbial disease,
19 and even a real disease to sweep them and take away a
20 huge portion of the population.

21 I would also like to say that I like the U.S.
22 Fish and Wildlife Service. I want to trust you guys.
23 I've worked with the Fish and Wildlife Service before,
24 and please, don't let me down.

25 MS. TRAVERS: Thank you.

1 Jeanne Wilkinson, Carolyn Byrd.

2 MS. WILKINSON: Good evening. Jeanne
3 Wilkinson, J-E-A-N-N-E; W-I-L-K-I-N-S-O-N.

4 We, as a country, have just spent tens of
5 millions of dollars and built widespread public support
6 to recover the Greater Yellowstone grizzly bear
7 population. We have worked together to show that the
8 Endangered Species Act works. And now grizzlies, four
9 years after they were listed, have never enjoyed a
10 higher profile.

11 What we have with the Greater Yellowstone
12 grizzly population is something extraordinarily rare,
13 and really in the big picture, given the rarity of
14 grizzlies in the landscape, there aren't that many
15 bears, nor do bears really represent that many
16 management challenges.

17 Before the Fish and Wildlife Service proceeds
18 any further with proposed delisting, it owes the
19 American people answers to important questions being
20 raised by a range of independent scientists, and it
21 needs to have the states prove beyond a shadow of a
22 doubt they are up to the challenge.

23 Frankly, the agreement floors between the
24 Fish and Wildlife Service and the state of Wyoming with
25 its Wolf Management Plan, or lack thereof, over 85% of

1 the state was insulting to we citizens who have
2 supported the ESA.

3 Here are some essential questions:

4 What is the rush to delist?

5 Explain why they must hastily remove
6 protection when there are serious issues regarding key
7 bear foods and the consequences expected to play out in
8 a few short years, as well as climate change and
9 development patterns in the ecosystem.

10 Two, why does delisting necessarily mean the
11 bears must be hunted? There's nothing in the ESA that
12 mandates a return to killing bears for fun and sport.
13 And after a 40-year absence, no one can claim that
14 killing grizzlies for trophies is a good tradition that
15 must be restored.

16 Three, why doesn't the Fish and Wildlife
17 Service tout the value that grizzlies bring to Greater
18 Yellowstone's one billion-plus nature tourism economy?
19 The Service only seems to portray bears as liabilities,
20 and I'm wondering, why is that.

21 Why does the primary conservation area not
22 include all of Grand Teton National Park and the
23 National Elk Refuge? Their absence makes no sense.

24 Why is the Fish and Wildlife Service and
25 members of the Interagency Grizzly Bear Study Team and

1 members of the states refuse to have a public debate
2 with Dr. David Mattson, who just gave a presentation
3 last week, and many people here have quoted it, who has
4 raised important points about the loss of key grizzly
5 bear foods and impacts on bear reproduction and
6 mortality?

7 These are just a few of many questions.

8 The American people overwhelmingly are
9 opposed to delisting grizzlies, and an even larger
10 number would be opposed to reinstating a trophy sport
11 hunting affairs.

12 Thank you.

13 MS. TRAVERS: Thank you.

14 Carolyn Byrd, and W. R. Mealeno.

15 MS. BYRD: Hi. My name is Caroline Byrd,
16 B-Y-R-D. I'm the Executive Director of the Greater
17 Yellowstone Coalition.

18 GYC has been working to protect grizzly bears
19 in this region for more than 30 years. Grizzly bears
20 represent the wildness of Yellowstone. They're an
21 Endangered Species Act success story.

22 The bear has been brought back from the brink
23 of extinction in the world's first National Park, and
24 that should be celebrated.

25 But, grizzlies also remind us of constant

1 threats, including climate change and increasing human
2 pressure on the ecosystem.

3 If delisting bears is to proceed, it has to
4 happen in a way that continues the conservation success
5 of the past three decades.

6 For GYC, a proposal to delist grizzly bears
7 must address three issues:

8 One, protecting core grizzly bear habitat;

9 Two, reducing the increased number of
10 conflicts between bears and human;

11 And three, giving bears the space and
12 management to allow them to eventually reconnect with
13 the grizzlies to the north for the first time in a
14 century.

15 The proposed rule has two key shortcomings.
16 First, the process itself is flawed. It's an attempt
17 to rush across the finish line without creating a clear
18 and well-coordinated management framework. We are
19 still missing critical pieces of this framework.

20 For example, state grizzly bear management
21 plans are incomplete. Forest plan amendments aren't
22 consistent with the current planning rule. No one has
23 yet addressed the National Park Service's concern about
24 how bears will be managed outside the Parks.

25 Without coordination and consistency, how can

1 we and the millions of Americans who support grizzly
2 bear conservation trust that these magnificent animals
3 will survive into the future?

4 The process must be slowed down. Before
5 anyone can consider delisting, all of the pieces must
6 be in place, and all of the inconsistencies and
7 questions must be addressed.

8 Other our concern is hunting. GYC opposes
9 hunting grizzly bears for sport.

10 Hunting is the most manageable threat that
11 bears face. In 2015 alone, 61 bears were killed in
12 Greater Yellowstone because of conflicts with humans.
13 This record number of bear deaths occurred without
14 hunting, and these deaths occurred while grizzly bears
15 were protected under the Endangered Species Act.

16 Because of this, we ask the Service and the
17 states to declare a moratorium on hunting after
18 delisting. This will allow the agencies time to
19 demonstrate their commitments to stable bear numbers.
20 It will also allow us to reduce the already high number
21 of human-caused bear deaths before we even start
22 talking about hunting.

23 So today, we decide where to go next for the
24 great bear.

25 I remember when I started working in the back

1 country of the Shoshone National Forest in 1980, it was
2 rare to see a grizzly bear. Today, the Shoshone holds
3 the greatest density of bears in the lower 48.

4 Let's acknowledge success, but let's move
5 forward with caution. It's critical we get this right,
6 for both the grizzly bear, for the Greater
7 Yellowstone.

8 MS. TRAVERS: Thank you.

9 MS. BYRD: Thank you.

10 MS. TRAVERS: W. R. Mealano and Shannon
11 Taylor.

12 MR. MEALAR: Thank you for having this
13 meeting. So I hope that you'll have one in the Grand
14 Teton area in the future. That sounds like a good
15 idea.

16 THE REPORTER: Give me your name and spell
17 it, please.

18 MR. MEALAR: M-E-A-L-A-R, William.

19 I'm not going to discuss many of the other
20 issues that have been brought up tonight, but I am
21 going to talk about a concept that's dear to me, the
22 genetic connectivity of grizzly bears and the
23 biodiversity of this bear.

24 The Greater Yellowstone bear is a primitive
25 bear that migrated over the Bering Land Strait, and it

1 is called Cash 4 as opposed to -- no, a Cash 3, an
2 earlier bear.

3 Most of the grizzly bears in North America
4 are of a more recent passage of these Eurasian grizzly
5 bears over the Bering Land Strait into North America
6 and stayed further north.

7 And there is a difference in their genetic
8 Aleo contribution. Once Aleos are lost, they are lost
9 permanently, forever.

10 And I think that the plan fails to recognize
11 the development of a program which will allow the
12 continuation of genetic diversity without its loss by
13 allowing the bear to migrate to the west and north.

14 And right now, this is impossible. They have
15 talked about the Sheep Research Station in the
16 Centennials, which is the only east/west mountain
17 corridor. And this is blocked by the Department of
18 Agricultural Sheep Research Station, which has
19 illegally killed bears there in the past.

20 The sheepherders are predominantly from South
21 America; have little respect for this animal, and
22 grizzly bears have been illegally killed there.

23 From the Centennial Mountains, the grizzly
24 bear could progress to eastern Montana, the (inaudible)
25 Wilderness and the Wilderness of No Return, and then to

1 Canada.

2 But right now, this migration pattern is not
3 available due to public land grazing and the Sheep
4 Research Station.

5 The same process is also true in the Gravelly
6 Mountains where over 14,000 domestic sheep with
7 nonresident and alien sheepherders there have also
8 illegally killed grizzly bears.

9 If we continue this trend to allow domestic
10 sheep production to obstruct genetic connectivity, it
11 will lead to the loss of genetic diversity.

12 These sheepherders maintain multiple large
13 guard-like dogs that displace migrating grizzly bears
14 away from potential natural corridors of migration.

15 And this is most prominent in female bears
16 with cubs. Barking, aggressive guard dogs will deter
17 them from their natural historic migration pathway, and
18 this is inappropriate, and this needs to be analyzed.

19 Thank you very much.

20 MS. TRAVERS: Thank you.

21 Shannon Taylor, Ryan Molde.

22 MS. TAYLOR: Thank you.

23 I'm Shannon Taylor. Last name T-A-Y-L-O-R.

24 I am one of the founding board members of the
25 Headwaters Sportsmen's Association. We started in

1 1996, and we have about 150 members.

2 We represent the resident, non-guided,
3 non-leasing hunters and anglers and do-it-yourself
4 hunters and anglers in Montana.

5 We support the delisting.

6 I'll keep my comments relatively short. I
7 will submit written documentation, but I do want to
8 thank the Wildlife Service for success. I'm here to
9 celebrate. We did a fantastic job with bringing back
10 grizzly bears. Yes! And it's time to transfer the
11 management from the federal government to the state
12 Fish, Wildlife Parks.

13 There's never been a big game species that
14 didn't thrive under state management. Never.
15 Including the big predators. And we will do a good
16 job.

17 You guys have done a good job. It's time to
18 pass it on. We support your move.

19 MS. TRAVERS: Thank you.

20 Ryan Molde, Rick Sitts and Kerry White is
21 after that.

22 MR. MOLDE: I'm Ryan.

23 MS. TRAVERS: How do you spell your last
24 name?

25 MR. MOLDE: My last name is M-O-L-D-E.

1 Anyway, I agree with what someone else said
2 earlier, that if the grizzly bears require their
3 recovery area to recover, they continue to require
4 their recovery area to stay recovered.

5 The reason for that being, a lot of the high
6 altitude habitat is outside of the Park. With the Park
7 being a volcano caldera, a lot of the higher altitude
8 peaks are outside the Park's boundaries, and this is
9 specifically the habitat that the grizzlies seek out in
10 the hotter summer months.

11 I mean, some of it probably has to do with
12 the food source, but then some of it is just -- it's
13 cooler, and that's where they go during the summer, and
14 they need that. They need that habitat.

15 And so I think that they should continue to
16 be protected within the grizzly bear recovery area, so
17 I think the sport hunting should be limited to outside
18 the recovery area, you know, if at all.

19 I guess I'm not optimistic, but it's not
20 going to be handed over to the states, so I think that
21 if there is to be sport hunting, it should be outside
22 the recovery area.

23 And I was going say that -- yeah, I mean,
24 that's basically it. I mean you can keep, you know,
25 kicking this decision down the road, but basically they

1 just continue to require the habitat that they've had
2 in the past.

3 And I actually think that inside the recovery
4 area, any sort of management should be more specific to
5 control problem bears, because any support -- any
6 support for the recovery of the grizzlies is dependent
7 upon -- well, let's just say that grizzlies have
8 different dispositions, and they are individuals, and
9 some of them are much more dangerous than others.

10 And how dangerous the bear is doesn't have to
11 do with how comfortable it is in proximity to people,
12 which is I think maybe why some of them get the ear
13 tags.

14 And then the last thing is, in British
15 Columbia, they have the Spirit Bears, which are the
16 white black bears. And then here in Montana, they have
17 unique color phases of grizzly bears that have also
18 been noted from Glacier National Park, and so I just
19 think that although there are, you know, 700 hundred
20 bears --

21 MS. TRAVERS: Thank you, sir.

22 MR. MOLDE: 700 bears -- yeah, you're
23 welcome.

24 MS. TRAVERS: Rick Sitts, Kerry White.

25 How about Robert Aronsen?

1 MR. ARONSEN: No.

2 MR. WHITE: My name is Kerry White,
3 K-E-R-R-Y; last name White, W-H-I-T-E.

4 I'm a representative of House District 64,
5 Montana Legislature, second term, Chairman of Natural
6 Resource Committee.

7 The Grizzly delisting has been politicized,
8 and a lot of different science on both sides and a lot
9 of emotion that I hear.

10 A couple of years ago, we had a meeting down
11 in Twin Bridges, and it was discussed about three
12 recovery zones -- one in Wyoming, one in the National
13 Park, and one in southwest Montana.

14 When listing first occurred, and you had a
15 problem bear, Wyoming would take a Park bear, or
16 southwest Montana would take a Wyoming bear, or the
17 Park would take problem bear out of Wyoming.

18 Right now, all three of those zones are
19 saturated. Wyoming won't take a Park bear that's being
20 a problem, and southwest Montana won't take a Wyoming
21 bear, and vice versa.

22 The bears are starting to extend beyond the
23 range, recovery zones, further out into the plains in
24 areas that are beginning to cause problems. And some
25 here would disagree with the fact that we have cattle

1 grazing and sheep grazing and leases on public lands.

2 And we also have private property with
3 livestock operations, both sheep and cattle. Wolves
4 have been depredation. We have a fund through the
5 State Legislature to help these property owners with
6 depredation.

7 Wolves have had effect, especially on the elk
8 population, which is a food source for the grizzly
9 bears. They've ate it, the grizzly bears, in many
10 cases in getting food, because wolves many times will
11 kill the elk and deer just for the sport of it, or
12 teaching their pups how to kill, and the grizzly bears
13 have been able to capitalize on that.

14 I agree with Randy Newberg and the hard work
15 that was done through the Governor's office. You, as
16 the Fish and Wildlife Service, you have a tough job. A
17 lot of this is political and a lot of it
18 science-based.

19 Chris Serveen, I have a great respect for the
20 man. He's a brilliant grizzly bear biologist.

21 And I think you guys are making the right
22 decision on delisting, and I would hope that you move
23 forward with this.

24 And lastly, I would hope that you defend your
25 decision vigorously in court, because groups will sue

1 this. And I admit to you the legislature, we will do
2 all we can to help you out to try to, you know, defend
3 this action, delisting.

4 I think it's time for Fish and Wildlife and
5 Parks to have control over the management of these
6 bears.

7 Thank you very much.

8 MS. TRAVERS: Thank you.

9 Robert Aronsen, Kurt Alt, Louise Willcox.

10 MR. ALT: My name is Kurt Alt, A-L-T.

11 I'm here representing the National Wild Sheep
12 Foundation. The Mission of the Foundation is to put
13 sheep -- put and keep sheep on the mountain.

14 It's also to support sound science in its
15 role of wildlife management and conservation, and it's
16 to support the proper role of hunters and the
17 conservation effort that they bring to the table on any
18 species they are involved with.

19 We will be submitting written, more detailed
20 written comments to you before the comment period is
21 over.

22 I want to thank you for being here tonight.

23 You have a whole bunch of people on some
24 state, other federal employees and some good scientists
25 in this room in the back.

1 And I want to tell you, for 35 years I worked
2 for Montana Fish, Wildlife and Parks as a wildlife
3 biologist and a wildlife manager, most of it in the
4 Yellowstone system.

5 Worked on five continents. I've met
6 biologists, brown bear experts in Norway and Sweden,
7 and in that part of world, Dr. John Swensen. These
8 people in this room behind me, your scientists, are
9 collaborators and peers of Dr. John Swensen.

10 He would tell you, and I will tell you,
11 there's no better place, there's no place in the world
12 that has the length and the quality of science on a
13 bear population than what your scientists have in this
14 Greater Yellowstone Ecosystem.

15 The Wild Sheep Foundation supports their
16 work. They support the impact of that science in
17 influencing policy and decision-making.

18 I really disagree that you or the scientists
19 were bought. We actually have a group of scientists
20 that don't work for the Fish and Wildlife Service or
21 state agencies that are doing most of the monitoring
22 and much of the research. They are not purchased by
23 U.S. Fish and Wildlife Service or any state agency.

24 You have one of the most independent, most
25 collaborative and most informing science that you could

1 find anywhere in the world on this bear population.

2 Their science is good.

3 I thank you for the effort you're making in
4 proposing delisting.

5 MS. TRAVERS: Thank you.

6 Louisa Brigham, Robert Brigham.

7 MS. WILLCOX: Hi. Louisa Willcox.

8 L-O-U-I-S-A; Willcox, W-I-L-L-C-O-X.

9 Thank you for the opportunity to testify.

10 I stand here tonight opposed to delisting of
11 grizzly bears, as I have done since 1992, when it was
12 first proposed.

13 The first reason has to do with the safety
14 net for grizzly bears after federal protections are
15 moved. The state bear plans and the conservation
16 strategy don't make anybody do anything or fund
17 anything. That's not adequate to protect bears after
18 delisting.

19 The second reason has to do with the role of
20 citizens in recovery. You can't ignore the important
21 role of litigation and citizen access to the courts in
22 moving grizzly bear recovery forward, especially here
23 on the Gallatin Forest and the nearby Targhee.

24 The U.S. Fish and Wildlife Service stood
25 silent in the face of mounting science showing the

1 harmful impact of roads, of logging roads, in the 1980s
2 and 1990s. Fish and Wildlife Service typically failed
3 to discharge its oversight duty to conserve grizzly
4 bears until forced by federal judges in response to
5 citizen litigation.

6 After delisting, the citizen access to the
7 courts will vaporize. Citizen watchdogs are an
8 important part of a functioning democracy in grizzly
9 bear recovery, especially given the high level of
10 political interference and wildlife management here in
11 the region.

12 Third, the ecosystem is unraveling due to
13 climate change and invasive species. When I began
14 working on grizzly bear recovery some 30-odd years ago,
15 no one foresaw these major problems.

16 The history of grizzly bear recovery is the
17 history of surprise. Yes, grizzly bears are making
18 adjustments, but they don't happen overnight. We
19 should forebear and let them adapt, not rush in an
20 ill-conceived effort to appease the states that serve
21 the ethos of yesteryear - domination and killing.

22 We are doing better to coexist with grizzly
23 bears. We are doing better than four years ago, but we
24 can and must do better yet, not just for us, but as the
25 tribes always remind us, with the next seven

1 generations in mind.

2 Thank you.

3 MS. TRAVERS: Thank you.

4 Robert Brigham, Paul Lally.

5 MR. BRIGHAM: Hi. My name is Robert

6 Brigham. I'm an Bozemanite, third-generation Montana.

7 I was fortunate enough to grow up in Bozeman,

8 learning as much about grizzlies from my time in the

9 back country as from books.

10 I'm very frustrated that I had to limp down

11 here tonight, and my walk home is going to be more

12 strenuous than many backpacking trips that I've gone

13 on.

14 After the recent ruling by Federal Judge Dana

15 Christensen, this process should have been suspended.

16 Judge Christensen made it very clear that you can't

17 ignore science and reality and climate change for

18 politically expedient decisions that benefit special

19 interests.

20 And we are in the same boat with the grizzly

21 bear now as we were with wolverines, except with

22 wolverines, it was failure to do the right thing, and

23 with grizzly bears, it's actually a step backwards.

24 And I think it's worse for that reason.

25 I don't think that you can look at this just

1 from the perspective of how you wish the states would
2 have it play out. I think you need to look at the
3 actual governance of the three states involved.

4 Idaho has scandal after scandal after scandal
5 since the delisting of wolves.

6 Wyoming Fish and Game, they're so bad, they
7 feed the elk.

8 And here in Montana, while the previous
9 governor suspended the bison slaughter, we've gone
10 backwards. And with the current governor, the bison
11 slaughter is a constant reminder that Montana Fish,
12 Wildlife and Parks cannot handle the responsibility of
13 managing wildlife in the Greater Yellowstone Ecosystem.

14 So, if this is going to be about politics
15 instead of science, and if the science is going to be
16 ignored, let's have an honest political debate over
17 this. And having these hearings in Bozeman and Cody
18 does not accomplish that goal.

19 I demand that you extend the public comment
20 period for an additional 180 days and have public
21 hearings in at least the 20 most populous population
22 centers in the United States.

23 Since our forefathers beat the Crown in the
24 Revolutionary War, the animals of our country belong to
25 all of us, not just the people in Bozeman and Cody.

1 And so have these hearings in L.A. and New York and
2 Chicago and down the list until you can get a
3 representative sample of Americans the ability to weigh
4 in. Because right now, this process is as flawed as
5 its conclusion.

6 So, please do the necessary --

7 MS. TRAVERS: Thank you sir.

8 MR. BRIGHAM: -- stuff to make this happen.

9 MS. TRAVERS: Thank you.

10 Paul Lally.

11 We're going to take 10-minute break to give
12 the court reporter a break.

13 Are you Paul?

14 MR. LALLY: I am.

15 MS. TRAVERS: We will listen to you, and then
16 we will take a break.

17 MR. LALLY: This will be quick. I'm not
18 going to rehash everything else that's been said here.

19 MS. TRAVERS: Please, we have a speaker. Be
20 respectful. Thank you.

21 MR. LALLY: Well, I guess I would like to say
22 that I'm in agreement with the Fish and Wildlife
23 Service's Director Dan Ashe in an email sent to his
24 Assistant Gary Frazer, acquired through the Freedom of
25 Information Act. And I quote,

1 "This recommendation seems
2 at odds with the best available
3 science standard of the Endangered
4 Species Act."

5 And the rest of this has already been
6 covered, so...

7 MS. TRAVERS: Thank you.

8 We are off the record.

9 (Whereupon, a short recess was taken.)

10 MS. TRAVERS: Okay, we are back on the
11 record.

12 Rick Sitts?

13 MR. SITTS: I don't have -- (inaudible).

14 MS. TRAVERS: Robert Aronsen.

15 MR. SITTS: Good evening. I'm Rick Sitts. I
16 live down in the Island Park caldera neighborhood much
17 of the year. I've been at Vertex, which soon turned in
18 the paper the person who was hit.

19 I have also had encounters with grizzlies on
20 the trail and had serious bear conflicts in my
21 immediate neighborhood.

22 But that's not the purpose here. The focus
23 is on the rule. So, I've come just to make a comment
24 about some of the science, since you are concerned
25 about the best available science being in there and its

1 application being accurate and effective.

2 And my concern is that in developing the
3 rapid recovery criteria, particularly the third one,
4 you are engaging in a lot of quantitative analysis of
5 mortalities.

6 And mortalities are the only loss that's
7 dealt with there. But we all know that losses happen
8 from mortality in addition to moving outside of an area
9 to immigration.

10 And immigration is only mentioned once in the
11 rule, and it's in a general sentence about what
12 populations do.

13 And when I took a look at the data in the
14 conservation strategy document, I could look at it and
15 make out preliminary type estimates that maybe 10 bears
16 are immigrating out of the DMA every year in recent
17 times from immigration outside of the DMA, going out.

18 And that's from indications on females with
19 cubs of year, and maybe she's got cubs, too. And there
20 are independent bears living out there, and then
21 there's some loss data. But idea is that 10 or so, or
22 maybe more or less.

23 But anyway, there are some being lost through
24 immigration, okay. What that means in the application
25 of your recovery criteria is that 10 bears aren't being

1 accounted for.

2 And at 674 is our goal. You have 53 that can
3 be lost; 16 allocated to discretionary hunting, okay,
4 and if you have ignored 10, maybe you have got a few
5 more going to unintended losses, then maybe your losses
6 overall are a little greater than you think.

7 And, 674 is not going to be maintained. It
8 might actually drop a little bit.

9 Thank you.

10 MS. TRAVERS: Thank you.

11 MR. SITTS: I have some recommendations to ask
12 your peer reviewers what they think, and we're good,
13 existing in future data.

14 MS. TRAVERS: Thank you, sir.

15 Troy Bertelsen and Zach Cardosi.

16 MR. BERTLESEN: Hi. My name is Troy
17 Bertlesen. It's B-E-R-T-E-L-S-E-N.

18 And I'm a performance coach who works with
19 individuals and organizations to improve performance,
20 production, communication and connection. My clients
21 often experience side effects in the areas of personal
22 growth, consciousness and an improved sense of value
23 from within themselves.

24 I'm a hunter, also, and grew up in Helena.
25 And I have a Sportsman 500 license that my dad passed

1 on to me. It's No. 235.

2 And that license used to automatically
3 include a black bear tag. And I never had a desire to
4 ever shoot a bear or go for a Grizzly tag.

5 My spirit path in Montana led me to being a
6 sundancer with the Crow tribe, and I discovered that
7 the bear was one of their spirit animals.

8 To me, I'm enjoying the fact that there has
9 been some recovery in the state of Montana and up and
10 down the Rocky Mountain front, but I'm opposed to
11 delisting the bear at that time, because to me, the
12 collective consciousness of the political leaders in
13 Washington, D.C., Montana and neighboring states has
14 not yet elevated enough to continue the expansion and
15 connection of all grizzly habitat up and down the Rocky
16 Mountains to ensure the expansion and vitality of the
17 grizzly.

18 Thank you.

19 MS. TRAVERS: Thank you, sir.

20 MR. CARDOSI: Good evening. My name is Zach
21 Cardosi, C-A-R-D-O-S-I, and I reside in Bozeman,
22 Montana.

23 And I'm here because I strongly oppose the
24 delisting of the grizzly at this point.

25 Delisting grizzlies will ultimately shrink

1 the relatively small habitats, the smaller islands,
2 thus preventing any connectivity between the major
3 grizzly bear recovery zones, which will negatively
4 impact long-term grizzly vitality.

5 Human-caused grizzly deaths are at all time
6 highs, and the species is currently protected, so this
7 is only going to increase once the protections are
8 lifted.

9 This decision seems to be influenced by a few
10 political figures and special interest groups rather
11 than science in the majority of Americans.

12 Grizzly bears are what make the Northern
13 Rockies different from every other place in the lower
14 48. Americans and tourists abroad notice, and that is
15 why people from all over the world come here.

16 There's no grizzlies in Colorado. There's no
17 grizzlies in California, pretty much any of the other
18 western states. It is in our best interest to keep the
19 grizzly protected at this point, not only for the
20 ecological integrity of the GY Ecosystem, but also for
21 our economy.

22 When you have something this rare, you need
23 to protect it, and I recommend that you reconsider your
24 decision.

25 Thank you.

1 MS. TRAVERS: Thank you.

2 Myranda Hagemann, Ken Sinay, and Kelli Aylor.

3 MS. HAGEMANN: My name is Myranda Hagemann,
4 M-Y-R-A-N-D-A; Hagemann, H-A-G-E-M-A-N-N. I'm a
5 resident of Bozeman.

6 And I oppose the delisting of the grizzly
7 bears for the good of our economy and the health our
8 land.

9 I kind of believe that a live bear could
10 create more revenue than a dead one. You know, you can
11 see a grizzly bear over and over again, but if once
12 you've kill a grizzly, that is final, except to the
13 hunter, but, you know, I doubt that tourists are paying
14 money to come see a grizzly bear on someone's floor.

15 And trophy hunting has always bugged me,
16 because the whole point of trophy hunting is in the
17 biggest and best out there. And everybody's worried
18 about the health of, like, elk populations and wolf
19 populations, but when you are killing the biggest and
20 best genes out there and taking those out the gene
21 pool, then that's what's diminishing things and
22 allowing diseases to rise.

23 And I care greatly about the grizzly bear,
24 but I mainly care about just the health of the land and
25 the ecosystem. And we've seen time and time again,

1 when you abruptly take a recovering keystone species
2 out of the loop, then everything else slowly just kind
3 of falls away.

4 And I mean, you know, if you really want to
5 delist, and you really want to hunt them, at least just
6 give it a little more time so that their population can
7 withstand the hunting.

8 And I understand with the wolves that were
9 imposed by the delisting of them, but I could see, you
10 know, their population can actually, like, handle it,
11 whereas the grizzly bears don't reproduce quickly
12 enough to replenish what's been taken away.

13 And if safety is an issue, then, you know,
14 maybe putting more funding towards the education. Like
15 most issues going on today, I feel like the greatest
16 opponent the country has to face is ignorance.

17 And, I don't know, another thing we forget is
18 that they maintain their own populations. Like before
19 we opened up hunting on wolves, the animal that killed
20 the most wolves were wolves, because they also don't
21 want to be overpopulated.

22 Bears don't want to be overpopulated. They
23 want their space land as well.

24 So, yeah, if that's got to happen, at least
25 just hold off and wait, please.

1 Thank you.

2 MS. TRAVERS: Thank you.

3 Ken.

4 MR. SINAY: Hello. My name is Ken, K-E-N;
5 Sinay, S-I-N-A-Y.

6 And I'm a guide. I'm the director of a
7 business called Yellowstone Safari Company.

8 Years ago when I was -- thank you for this
9 opportunity, by the way.

10 Years ago when I was a college student in
11 Arizona, and in the earlier years and that, I remember
12 reading articles about grizzly bears and research done
13 by the Craig heads up here. And when I was down in
14 that Southwest area, I really wondered to myself
15 whether I would ever be able to see one.

16 And now, I see them actually frankly on a
17 regular basis. I saw two today and shared them with
18 other people. And that is what I do a lot of.

19 And I've always been a
20 "compromise/communicate" kind of guy. And I started
21 this business with the intent of demonstrating economic
22 values.

23 But I found that over time, my perspective
24 has changed quite a bit. I found that it doesn't
25 necessarily truly promote conservation, per se.

1 And I found that there's so many other issues
2 - political, social and human and natural - that it
3 can be very difficult to work this out.

4 Without a doubt, the success, the increase in
5 grizzly bear population and the meeting of the terms of
6 the Endangered Species Act and the recovery plan has
7 been great. It really is a success story, and I'm
8 really grateful for that.

9 I've spent over 30 years of my life in
10 grizzly country. I've lived on the Rocky Mountain
11 front, worked up there for a number of different
12 entities as well. I truly am grateful, and I
13 appreciate what the Fish and Wildlife Service, as well
14 as all the public and the conservation organizations
15 have achieved.

16 But at the same time, we have a rapidly
17 changing natural world, and a rapidly changing human
18 cultural world. Human demographics are impacting this
19 area dramatically.

20 When I see an article in last week's paper
21 about 100,000 people living in the Gallatin Valley, and
22 I see maps associated with proposed development over
23 time, or projected development over time, I can see
24 that that is going to pressure the bear. I can help it
25 when I say that.

1 And I notice that so many people here tonight
2 have said "The Bear". And it even brings to mind the
3 incredible value to the human psyche of "The Bear".
4 So, they hold a special place in our mind.

5 You know, personally, I reject the delisting,
6 but in reality, I know that we have a plan; we've made
7 some terms, and that's where we should be going. I
8 trust Montana Fish, Wildlife and Parks.

9 But the fundamental thing that I'd like to
10 project tonight is that bears need to be managed -- and
11 all wildlife resources need to be managed -- in all
12 these spectrums of politics and culture and society.

13 But we also need to manage them with emotion
14 and compassion, not only for the animals and the
15 resources, but for the human resource as well.

16 So, for example, a doctor can tell me I have
17 cancer, but another doctor might tell me in a sensitive
18 way that I have cancer, and help me deal with that in
19 the future.

20 MS. TRAVERS: Thank you, sir.

21 MR. SINAY: And that's what I would like to
22 see us do for the bear. Thank you.

23 MS. TRAVERS: Thank you.

24 Kelli Aylor.

25 MS. AYLOR: Thank you.

1 My name is Kelli Aylor, A-Y-L-O-R.

2 Really, everyone has touched sort of markably
3 on the bears and why they question the delisting.

4 I think, according to the Endangered Species
5 Act, if we have met the quota, then delisting is
6 right.

7 But I think what people fear is what's going
8 to happen after they are delisted? How are these
9 animals going to be protected? And does delisting mean
10 that they aren't going to be protected?

11 You know, these creatures are highly
12 intelligent animals, and they biologically have served
13 mankind through their miraculous ability to hibernate.

14 It is from researching hibernation in the
15 bear that we have learned to successfully preserve
16 organs for transplants, have helped patients manage
17 their diabetes, and even how to help astronauts
18 preserve muscles tone in space. But, we haven't talked
19 about that.

20 No, we talk about an animal that comes in
21 conflict with the rancher's sheep herd, and that animal
22 has to be killed. We don't look at that rancher and
23 say, "Excuse me, but you don't have very good ranching
24 techniques."

25 I'm on a ranch. I know how to prevent

1 predation. And yet we subsidize, and the grizzly bear,
2 any animal, gets the short stick.

3 And then let's consider the high rates of
4 human-caused grizzly deaths each year, minus now
5 proposed hunting.

6 And how can you trust a department to manage
7 grizzly bears when they can't even impose significant
8 punishment on illegal poachers? They don't have the --
9 Fish and Wildlife of Montana, they don't have the
10 manpower during deer season hunting to answer all the
11 calls from concerned citizens regarding hunting
12 violations.

13 And finally, representative, commissioner,
14 like Gary Wolfe of District 1, publicly assigned a
15 commodity value to wildlife quality stating, "Big game
16 hunting is in high demand, and if you're a private
17 landowner, you can make good money on that."

18 So, what's going to happen when that big game
19 is a grizzly bear?

20 Thank you.

21 MS. TRAVERS: Thank you.

22 We have called all the names of registered
23 speakers. If there is anyone else who would like to
24 speak this evening, please register at the registration
25 table, and we will call you to the microphone in a few

1 minutes.

2 We have no additional speakers. The hearing
3 will remain open until 8 o'clock p.m. We will take a
4 recess until we register additional speakers.

5 We are off the record.

6 (Off the record.)

7 MS. TRAVERS: We have two speakers. Bryon
8 Dingham and Brian Chattin.

9 Go ahead.

10 MR. DINGMAN: Hi. I'm Bryon Dingman,
11 D-I-N-G-M-A-N.

12 I'm a third-generation resident of the
13 Gallatin Valley. Been an avid hunter my entire life.

14 I've always been thrilled, an opportunity to
15 see a bear, particularly a grizzly bear. And my
16 concern about delisting is just that the hunting and
17 destruction of the bears is counterproductive to the
18 thrill and enjoyment of the general public in seeing
19 the bears.

20 And at least until these connectivity areas
21 are established, that the delisting should be held off
22 until we feel secure and have some connectivity areas,
23 and possibly even that the general population desire
24 that control of the bears over the opportunity to be
25 able to watch them in their habitat.

1 That's all. Thank you.

2 MS. TRAVERS: Thank you.

3 Last?

4 MR. CHATTIN: Hello.

5 I want to thank you for giving me time to
6 speak, and it looks like I'm the last one for the
7 evening.

8 Coming from Jackson, I didn't think I would
9 able to make the cut today to be able to speak. But
10 again, my name is Brian Chattin, C-H-A-T-T-I-N.

11 I'm a resident of Jackson, Wyoming. Native
12 Georgian. I moved to Jackson in 2013.

13 My first encounter with the grizzlies of the
14 Greater Yellowstone area was in 1989. As a teenager, I
15 fell in love with this area and the beauty it had to
16 offer, up to and including the iconic grizzlies and
17 majestic wolves.

18 As a troubled teen, I was raised by my
19 grandparents. They loved the place. Loved the Park.
20 Loved the grizzlies. Loved the wolves. And I was very
21 fortunate to be raised by them up to my 18 years of
22 age. And they brought me out, and it changed my life.

23 You know, the grizzlies are iconic for all of
24 our Greater Yellowstone area - Montana, Idaho and
25 Wyoming.

1 And I fell in love with this area and the
2 beauty it had to offer, including its iconic grizzlies
3 and majestic wolves.

4 Jackson and the Greater Yellowstone area has
5 always been my home in my heart. I am very fortunate
6 to live in Jackson, working in the hospitality industry
7 and management, and I can tell you truly, without a
8 doubt, I oppose delisting of the iconic grizzly bear.

9 I can affirm that it is a majority in our
10 town and in our industry. We have a lot of people
11 coming -- 3.2 million visitors, at the very least, up
12 to 4 million visitors last year -- coming through
13 Jackson to visit our parks and to see iconic grizzly
14 bears.

15 And I can tell you, as a majority in Jackson
16 and the majority to all of our industry in the tourism,
17 it is definitely opposed.

18 I am proud to be a wildlife advocate, and
19 like most advocates, I have a heartfelt and spiritual
20 connection with the Greater Yellowstone grizzly. It is
21 my hope more people, including you all, will take the
22 time to have that spiritual and heartfelt connection
23 with our bears. I truly believe if you will take the
24 time and be a voice for our iconic grizzlies, and our
25 wolves, that you will never been the same.

1 And I thank you for my time.

2 MS. TRAVERS: Thank you.

3 It is now 8:00 p.m. On behalf of the U.S.
4 Fish and Wildlife Service, we appreciate the time and
5 effort you took this evening to present your comments.
6 They have been very informative and will be fully
7 considered in coming to a final decision.

8 The hearing is closed. We are off the
9 record.

10 (Whereupon, the hearing was concluded at
11 8:00 p.m.)

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REPORTER'S CERTIFICATE

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CASE TITLE: Delisting of GYE Grizzly Bears
HEARING DATE: April 12, 2016
LOCATION: Bozeman, Montana

I hereby certify that the proceedings and evidence herein are contained fully and accurately on the stenographic notes reported by me at the hearing in the above matter before the U.S. Fish and Wildlife Service, and that this is a true and correct transcript of the same.

DATE: April 18, 2016



Frances L. Mock
Big Sky Reporting
2308 Interlachen Circle
Billings, Montana 59105

As a 20 year veteran guide in Yellowstone I believe
It is imperative that we keep grizzlies listed. As a 20 yr veteran Yellowstone can go on for hours on why, but in three minutes:
** It used to be 260-600, then w/ no net increase, it's 700*

There are serious concerns on how you come to your conclusions about population data. In 2007, when counting methods changed, the number nearly doubled, impossible with a slow-growing population, but coincidentally the year before delisting was back on the table. There may be 700 bears, but base population data needs to be made available to trusted, independent, qualified sources who don't have a stake in the GYE. The National Research Council comes to mind, *someone* who can be trusted with the geographic data you don't want made public. You insist we take your data at face value without independent review. That's just bad science. ~~There are factors that skew the extrapolation methods, which are a giant guessing game, anyway.~~ *The population estimation methods are based on assumptions (e.g. which observations are duplicates) w/o release of the data to independent review.* You say that grizzlies are finding other food as their historic food sources dwindle. But I don't believe you've taken into account the variables with other options, like caloric intake, quality and availability of that food, or how much vulnerability or human interface is required to get to them. The 'adaptable bear' is not a valid argument for delisting.

Ashea Mills

After climate change, the second greatest threat to the GYE and grizzlies is development. ~~The~~ Habitat fragmentation has perpetually increased the isolation of this group of bears. Why are GYE bears at risk for delisting and hunting when the larger northern population is not? Might it have to do with the incredible amount of money and power behind the hunting lobbies, extractive industries and trophy homes that are a constant threat to our way of life, economies, wildlife habitat, and wildness? I believe it must, since there's no other reason to delist only this population. By delisting, you will be responsible for opening up at-risk habitat, losing essential and ever more rare wilderness. The grizzly acts as a shelter species for a ~~possibly~~ unknown amount of flora and fauna, some of which, like the wolverine, deserve a discussion, but can't even get the attention from you they need. The extinction rate globally is currently 1000 times

faster than at any point in the paleontological record. And as a matter of scientific record, it is our fault. With a growing population, and constantly less viable habitat now is CLEARLY NOT the time to delist.

Grizzly protection also shelters my sanity. To live and hike in griz country ^{gives} moves me to peace, stillness, and equilibrium in an ever more deafening society, and it is irreplaceable. ~~Being face to face with a grizzly leaves with~~ my cells on fire, and a passion for life you cannot buy.

I've been face to face with Grizzlies on several occasions and it leaves

I recently had a daughter. My decision to have a child knowing what I know about the state of affairs in the world today, (and my husband is a climate scientist), is directly tied to me raising her in a place where wildness reigns and the possibility of a bear encounter keeps ~~you on your~~ ^{me} toes. It is enlivening, and for ~~us~~ ^{us} necessary. *US ON OUR*

If you delist, we will see a major drop in population (already happening with a 6% decrease 2 yrs ago, and 59 known dead last year, probably half of the actual number) due to hunting, and pressures on viable sows. You will depress the already tenuous genetics. You will force us into paying millions more to re-list through the bureaucratic channels. But then, we will have lost so much more of their viable habitat, so much more of our local woods and streams and mountains, so many more animals, and so much more of what makes life worth living.

Please do not sacrifice the grizzly and all they represent.

U.S. Fish and Wildlife Service Mountain-Prairie Region

Yellowstone Grizzly Bear Population Proposed Delisting



Comment Form

The U.S. Fish and Wildlife Service (Service) is accepting written comments on the Greater Yellowstone Ecosystem grizzly bear population proposed delisting rule, the draft supplement to the 1993 Grizzly Bear Recovery Plan for the Yellowstone grizzly bear population and the draft 2016 Conservation Strategy.

The recovery of the Yellowstone grizzly bear population serves as a remarkable Endangered Species Act success story. It is the result of strong partnerships among the Service, federal and state agencies, tribes and other partners. Yellowstone grizzly bear numbers have rebounded from as few as 136 bears when listed in 1975 to an estimated population of more than 700 today. There is now a sustainable and resilient population that occupies the entire available habitat. The population is at or near the ecosystem's long-term carrying capacity.

To comment, return this form by mail to the address on the reverse side. Fold this form on the lines with the return address showing, tape it closed, affix a stamp, and mail. You may attach additional pages. Comments may also be submitted for Docket No. FWS-R6-ES-2016-0042 via www.regulations.gov. For your comments to be the most effective, the Service suggests the following guidelines:

- Be specific. Give defined reasons, not broad statements, or opinions.
- Share site-specific observations, data, or knowledge.
- Detail important environmental and community factors.
- Be timely. Comments are requested by **May 10, 2016** to be considered in the final rule.
- This is not a voting process. Petition signatures typically only express an opinion, which is not helpful in our decision making.

I oppose G.B. delisting because genetic diversity and connectivity to the north & western Rocky Mountains. Domestic sheep grazing is a major obstruction to G.B. connectivity because of alien sheep herders who will harass or kill G bears near their flocks. The sheep grazers have multiple large guard dogs that will displace sows and cubs away from their logical migration pathways to the Yukon or NW Idaho.

You may insert additional pages.

Please provide your contact information.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

William R. Mealer
NAME
Gallatin Wildlife Association
ORGANIZATION
300 N. Willson Ave, # 300-6
MAILING ADDRESS
Bozeman, Mt., 59715
CITY, STATE ZIP CODE

Thank you for your interest and participation!

While seeing the Greater Yellowstone Ecosystem (GYE) grizzly population increase to a more sustainable level is a positive sign and a move in the right direction, there is still much work that needs to be done before delisting. There are also serious concerns. I am in agreement with Fish & Wildlife Services (FWS) director Dan Ashe in an email sent to his assistant Gary Frazer (acquired through the Freedom of Information Act); "this recommendation seems at odds with the best available science standard of the Endangered Species Act."

- ✓ 1. The grizzly population is far from "recovered" in the lower 48 and the various wildlife agencies are aware of that.
 - ✓ A. If there is a surplus in this population, then more effort is needed to re-establish grizzlies in suitable habitat in other wilderness areas and/or other states devoid of grizzlies.
 - ✓ B. More effort is needed to create wildlife corridors to improve genetic diversity and the overall health of the species. Currently these populations are too fragmented to be considered "recovered".
- ✓ 2. There has been much debate from other grizzly bear experts about the methods used for counting bears, subsequently the numbers estimated could very well be flawed.
- 3. There are serious concerns that this will substantially diminish visitor sightings in the GYE, which ranks as the #1 point of interest for many of the 4-million park visitors.
- ✓ 2. Many Americans are genuinely concerned this is a calculated political stunt to weaken the Endangered Species Act, which has proven to be highly effective for real recovery.
- 3. Allowing the states to manage wildlife has already proven to be largely ineffective for the welfare of predators such as wolverines, lynx, wolves, bobcats, fox, and ultimately grizzly bears if this passes. The states have in fact shown a serious lack of commitment. Case in point...
 - A. FWS with the full support of Governor Mead of Wyoming managed to reduce the states wolf population by 40% in three months after they were delisted. They were later put back on protection of the Endangered Species Act by a federal judge who ruled FWS was "arbitrary and capricious" in accepting Wyoming's promise of "minimum management targets".
 - B. Congresswoman Cynthia Lummis, and Senator John Barrasso both of WY, have advocated with language in bill HR-884 to protect delisting from further judicial review

and to deny opponents due process.

C. We are hearing similar sentiments from elected officials in Montana, so it seems clear how the states will manage grizzly bears.

D. In September 2014 Wyoming Fish & Game “bear management specialist” Luke Ellsbury illegally shot and killed a grizzly bear 23 feet from state highway 14/16/20 west of Cody. He apparently couldn’t tell the difference between a ~~wet~~ grizzly bear and a black bear. Wyoming Fish and Game punishment for such an egregious act of incompetence and dereliction of duty—a week without pay at the start of hunting season! Any other business of a proportionate act would have fired him on the spot. By the way, Mr. Ellsbury is a contributing author for much of the documentation used by the state for delisting.

7. If grizzly bear numbers have indeed reached their carrying capacity for this region, then the current number of bears represents a sustainable and healthy population. Why the rush to reduce it to an unhealthy and potentially unsustainable population?

8. What about pressures from a small minority group representing the trophy hunting community? In quoting Michael Sutton, former federal wildlife inspector and past president of California Fish & Game Commission; “the problem with trophy hunting is that it inspires unethical and sometimes illegal behavior on the part of hunters, that reflect poorly on all hunters not just trophy hunters”. It also conveys a message that it is o.k. to kill threatened or endangered wildlife, a huge and well documented international problem.

Finally, in the same manner that the bald eagle became a symbol for our country, no animal represents the spirit of American wilderness like the grizzly bear. To see them reduced to a cash crop for a few narcissistic trophy hunters is a disgrace to humanity. To witness federal agencies being bullied by lobbyists and political pressures is shameful. Hopefully, the more forward thinking and influential will allow grizzly bears the same chance at real recovery that was bestowed on the bald eagle.

Paul Lally
Bozeman, MT

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12 APR 16
US F&WS
BOZEMAN, MT

I am a performance coach who works with individuals & organizations to improve performance, production, communication & connection. My clients often experience side effects of my work in the areas of personal growth consciousness, and an improved sense of value within themselves.

no, I am a Hunter. I grew up in Helena. I have the sportsman's license my dad passed on to me #235. This license used to automatically include a blue bear tag & an opportunity to purchase a grizzly tag.

Since my spiritual path is that of a shaman with the Grows - I discovered the reason I have never had the desire to shoot or harm any bear. [The bear is one of my spirit animals] There has been some recovery in the population of grizzly bears and for that I am grateful.

I am opposed to decimating the grizzly bear at this time. Because to me, the consciousness of

the political leaders in Washington, D.C., Montana & NEIGHBORING STATES ~~NOT~~ NOT EVILATED ENOUGH (YET) TO CONTINUE. ~~THE GRIZZLY~~ THE EXPANSION & CONNECTION OF ALL GRIZZLY HABITAT UP & DOWN THE ROCKY MOUNTAINS TO ENSURE EXPANSION OF THE GRIZZLY.

~~Recognize~~ Respect for dedicated employees of USFWS

Agree w comments about climate change

& degrading habitat,

& compromised food sources.

High Country News

FOR PEOPLE WHO CARE ABOUT THE WEST

Glen W. Monahan

Is Fish & Wildlife under the thumb of political influence?

73 percent of agency scientists say political interference is too high.

Hogan mentioned science as the basis for this proposal.

Joshua Zaffos (Oct. 9, 2015) Web Exclusive

comments today w/ the politics of the service & its ability to function as a trusted manager of precious wildlife.

The U.S. Fish and Wildlife Service's recent announcement that the greater sage grouse does not warrant protection under the Endangered Species Act was widely hailed as a conservation success (<https://www.hcn.org/articles/sage-grouse-test-the-effectiveness-of-the-endangered-species-act>). Federal officials, along with industry supporters and Western communities across the grouse's 11-state range, claimed voluntary state and landowner actions were enough to protect the bird and avoid federal restrictions.

But another explanation lurks behind Fish and Wildlife's decision for the grouse and other imperiled species that have dodged or received less protective ESA listings in recent years: Political interference and a lack of scientific integrity are influencing outcomes and hampering the agency's work.

According to a new survey and report ([http://blog.ucsusa.org/survey-says-new-report-shows-scientific-integrity-at-federal-agencies-needs-improvement-900?](http://blog.ucsusa.org/survey-says-new-report-shows-scientific-integrity-at-federal-agencies-needs-improvement-900?ga=1.138234544.1284172896.1443850475)

ga=1.138234544.1284172896.1443850475) compiled by the Union of Concerned

Scientists: 73 percent of Fish and Wildlife scientists say political influence is too high at

the agency and a relative majority believes their office is less effective than it was five

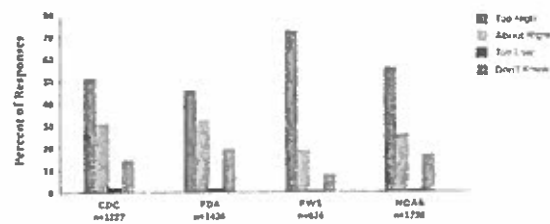
years ago. Those alarming figures stand out at Fish and Wildlife, compared with other surveyed federal science agencies where staff generally feels scientific integrity is holding firm or on the rise.

Mr. Hogan referred to agency science
Sage Grouse
Wolverine
300 individuals

2016
1,640
2015
1,376
18.0

FIGURE 4 Consideration of Political Interests at Agencies

In your opinion, how appropriate is the level of consideration of political interests at [the agency]?



Many agencies felt that too much consideration was given to political interests at their agencies. This was particularly true at the FWS where 75 percent of respondents reported the level of consideration of political interests was "too high." FWS respondents also noted that some issues came from the legacy of previous administrations affecting current work.

Seventy-three percent of surveyed Fish and Wildlife Service scientists say political influence is too high at the agency.

Union of Concerned Scientists

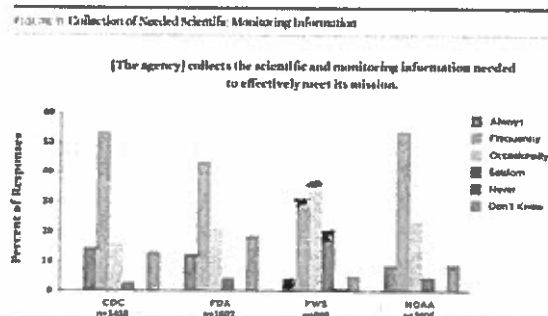
During his first inauguration speech in 2009, President Barack Obama pledged to "restore science to its rightful place," (<https://www.whitehouse.gov/blog/2009/01/21/president-barack-obamas-inaugural-address>) and later ordered agencies to draft scientific integrity policies for the first time ever. Those were welcome steps for researchers who felt politics trampled science-based management during the George W. Bush administration. But the implementation and effectiveness of those policies remain fuzzy.

According to the survey, many government scientists remain unaware of their agencies' policies or what they mean, says Gretchen Goldman, the report's lead author. For example, the policies should enable agency researchers to publish their own peer-reviewed research and to review agency documents that use their studies and names before they are released, but many respondents admitted they were unfamiliar with those protections, Goldman says. Still, compared with surveys conducted during the Bush administration, scientists at the Food and Drug Administration, Centers for Disease Control, and National Oceanic and Atmospheric Administration, say agency effectiveness is increasing.

7

But the Fish and Wildlife Service is another story. In addition to scientists' overwhelming indictment of political influence at the agency, many identified a lack of staff capacity and resources to complete their jobs. Further, more than half of surveyed Fish and Wildlife researchers said the agency only occasionally or seldom collects sufficient scientific and monitoring data to do its work; a much greater proportion than

respondents from other agencies. "That jumped out to me," Goldman says. "The second you don't have the ability to use the science, you get more vulnerable to political interference."



FWS's respondents report insufficient levels of monitoring data collection at a greater proportion than the CDC, FDA, and NOAA. These results, coupled with open responses from FWS's respondents, suggest that the FWS may be more resource constrained in terms of data collection than other agencies.

A majority of Fish and Wildlife scientists say their agency only occasionally or seldom collects enough monitoring data to fulfill its mission.

Union of Concerned Scientists

Comments shared through the surveys also indicated concerns over "accommodations to the states," Goldman adds, which potentially diminishes science-based outcomes since states may be more interested in avoiding federal restrictions than doing what's best for species, such as the grouse.

Allegations of heavy-handed political influence aren't new, and whistleblower cases have previously exposed questionable decisions. For instance, a whistleblower retaliation case in Texas (<https://www.hcn.org/u-s-fish-and-wildlife-whistleblower-retaliation-case-raises-questions>), settled last fall, documented how a Fish and Wildlife scientist was transferred and basically forced into early retirement after he argued politics and scientific misconduct factored into a non-listing for the dunes sagebrush lizard, whose habitat overlaps with the oil-rich Permian Basin.

Yet there are some signs of progress. Compared with surveys of Fish and Wildlife's Ecological Services staff during the Bush years, twice as many employees say morale is now good or excellent, and more feel they are now allowed to speak with the media and public about their work.

Somewhat ironically, Fish and Wildlife declined to make an official available for interview and instead issued a statement via email: "The Service is fully committed to the highest standards of scientific integrity, and welcomes the findings from the Union of Concerned Scientists' survey. We will carefully review the information in the survey and continue our commitment to ensure broad awareness, understanding, and implementation of the Department of the Interior's Science Integrity Policy."

Joshua Zaffos is an HCN contributing editor. Follow him [@jzaffos](https://twitter.com/jzaffos) (<https://twitter.com/jzaffos>).

Thumbnail photo: Detail of USFWS logo.

- underscored
- Copyright © High Country News
- Wolverine NO LISTING 300 individuals count gave USFWS spanking
 - Service is a dysfunctional state, where science is suppressed & ignored & politics dominate.
 - I submit that the USFWS is in a demonstrated state of dysfunction & is presently incapable of making science-based ~~political~~ decisions free from the corrupting influence of politics.
 - Point in time management or brink

Wyoming Wildlife Advocates believes removing ESA protections from the Yellowstone grizzly is premature. Due to the increasing effects of climate change and loss of critical food sources, these bears are perhaps in their most vulnerable situation ever.

Since listed as a threatened species in 1975, the world of the Yellowstone grizzly has dramatically changed.

Two of its four main food sources have nearly vanished. Because of warming temperatures, pine beetles have infested and killed most whitebark pine trees, which produce nutritious nuts for grizzlies. Native cutthroat trout is nearly gone from Yellowstone Lake, because illegally introduced, non-native lake trout has preyed on and nearly wiped out the cutthroat.

Climate change will only worsen this situation and probably compromise other food sources, such as army cutworm moths.

Grizzlies have dispersed farther to the periphery of their ranges in search of meat to replace the lost pine nuts and trout. This has led to increased conflicts, primarily with livestock and hunters, and, ultimately, death. For 2015, a record number of grizzly deaths were reported — 61.

When the unknown deaths are added, using an official formula, the number of deaths could easily be 100. That's 14 percent of the population of 717 bears. And unacceptable.

We need to do more to prevent conflicts. But with the states taking over management and adequate funding far from guaranteed, I fear conflicts and deaths will only increase.

The Fish and Wildlife Service needs to make sure the states have in place adequate mechanisms to ensure continued security of grizzlies.

After delisting, Montana, Wyoming and Idaho have pledged to allow the bears to be hunted for sport. This will only add to the annual number of deaths. Can we afford that?

With the population growing very little and mortalities increasing, we believe it is prudent to wait a few more years to determine whether the population is secure, sustainable and resilient enough to withstand future challenges.

Andrea Santarsiere

My name and CBD

The Center is opposed to delisting grizzly bears in Yellowstone for a number of reasons. First, we do not believe it is appropriate to designate a DPS (distinct population segment) for purposes of removing federal protection. At least one court has agreed that this is inconsistent with the language of the ESA, and yet FWS still insists on pushing forward with ^{this} delisting ^{on those grounds}. It is incomprehensible why the agency would spend time and precious funding on racing forward with a delisting rule while pending litigation may ^{a firm} ~~prove~~ the process ^{is} illegal.

Second, rather than taking a piecemeal approach to recovery and delisting, we believe that FWS should be ~~spending its time and money on~~ recovering grizzly bears in more of their historic range ~~in the western U.S.~~ ^{in the lower 48}. Right now grizzly bears only occupy 20% of their historic range, and there is plenty of remaining suitable habitat where bears can and should be recovered. For example, the Selway-Bitterroot in central Idaho is listed as one of six necessary recovery areas for grizzly bears, yet when we petitioned for FWS to push forward with its original proposal to reestablish a population there, FWS said it did not currently have the time or funding to do so. Yet ^Eestablishing a population in this area could provide crucial connectivity options for bears in the Yellowstone region, ~~which are~~ ^{which} currently ~~completely isolated from other bears and thus face genetic health challenges now and in the future.~~

~~This brings me to my third point in opposing delisting.~~ The current proposed rule does nothing to protect connectivity corridors which could possibly allow for genetic exchange between bears in Yellowstone and bears ^{to the north and west,} ~~in the Northern Continental Divide in MT or northern Idaho.~~ By creating arbitrary boundaries outside of which bears are not protected - which is highlighted by Wyoming's draft Plan stating they will manage areas outside of the DMA as unsuitable for grizzly occupation - delisting essentially ensures that Yellowstone grizzlies will remain forever isolated.

Finally, we believe the numbers this year prove delisting is premature. The population has been stable or declining ^{for over a decade} ~~over the last decade~~, and this year the population dropped substantially. Moreover, this year we have seen the highest number of



USFWS Delisting Hearing Remarks 4-12-16

Hello, my name is Caroline Byrd and I am the Executive Director of the Greater Yellowstone Coalition. GYC has been working to protect grizzly bears in this region for more than 30 years. Grizzly bears represent the wildness of Yellowstone. They're an Endangered Species Act success story. The great bear has been brought back from the brink of extinction in the world's first national park. That should be celebrated.

Grizzlies also remind us of constant threats, including climate change and increasing human pressure on the ecosystem. If delisting bears is to proceed, it must happen in a way that continues the conservation success of the past three decades. For GYC, any proposal to delist bears must address three issues: 1) Protecting core grizzly bear habitat, 2) Reducing the increasing numbers of conflicts between bears and humans, and 3) Giving bears the space and the management to allow them to eventually reconnect with grizzlies to the north for the first time in a century.

The rule has two key shortcomings. First, the process itself is flawed. It's an attempt to rush across the finish line without creating a clear and well-coordinated management framework. We're still missing critical pieces of such a framework. For example, state grizzly bear management plans are incomplete. Forest plan amendments aren't consistent with the current planning rule. No one has yet addressed the National Park Service's concerns about how bears will be managed outside the parks. Without coordination and consistency, how can we and the millions of Americans who support grizzly bear conservation trust that these magnificent animals will survive into the future? This process must be slowed down. Before anyone can consider delisting, all of the pieces must be in place, and all of the inconsistencies and questions must be addressed.

AMERICA'S VOICE FOR A GREATER YELLOWSTONE

Testimony by Wendy Hergenraeder at US Fish and Wildlife public hearing on Greater Yellowstone Ecosystem grizzly bears delisting April 12, 2016

Good evening, my name is Wendy Hergenraeder and ~~I am from Billings. Thank you for the opportunity to comment on this important issue.~~ *I am testifying as a Montana resident.*

The Endangered Species Act has greatly benefited the Greater Yellowstone Ecosystem grizzly bears. They have rebounded from as few as 136 bears when they were listed as threatened in 1975 to perhaps in the hundreds today. But grizzly bear populations in the U.S. are neither recovered nor sustainable. Today, wild grizzly bears number at best between 1,400 and 1,700 bears in the lower 48 states and are not recovered over a significant portion of their historic range—but in just a few small isolated areas. Climate change and loss of important food sources are also a big concern. And connecting to other grizzly bear populations is important for their survival. We have spent far too much time and effort supporting grizzly bear recovery to then risk losing it all with the possibility of trophy hunting.

As a native of Montana who visits Yellowstone Park to see wildlife, especially grizzly bears, I feel a huge injustice is being done to the American people if bear management is handed over to the states for trophy hunting. Tourists spend millions of dollars each year in the Northern Rockies benefitting the local economy of Montana. With the loss of its bears, Yellowstone National Park could lose millions of tourism dollars annually. U.S Grizzly bears still need federal protection to ensure they survive and thrive in the future. Grizzlies are a valuable resource to Montana and we owe it to future generations to protect them.

Grizzly Bear Delisting Hearing – April 12, 2016 – Comments to US Fish & Wildlife Service

I am vehemently opposed to grizzly bear delisting. I do not think your projections and research are adequate. You have not planned for the major decreases that have and will continue to occur in white bark pine seeds, cutthroat trout, and moths. Global warming, insect infestations and lake trout have and will negatively affect these sources of food. This causes the grizzly to eat more meat; therefore, they are more likely to get killed by humans, either because the humans entered their space, or with hunting of grizzlies; even hunters are more likely to be in danger.

I oppose grizzly bear hunting, even though I normally support big game hunting. Grizzlies are not killed for food, but solely for trophies. This is a disgusting human trait. Putting a beautiful wild animal on one's wall in their house or business is pathetic.

Hunting allowed by all three states bordering YNP is favored by state game agencies, is suspect, because these agencies derive significant revenues from hunting. These people can be biased toward saving their jobs. They don't have the money or knowledge to do adequate research themselves to develop bear management plans.

Hunting is dangerous, even if the hunting is for elk and bison, as the bears may be accidentally in the way of the bullets, if they are also hunting elk and bison. So might hunters and tourists get in the line of site, accidentally. Tourists are not just inside Park boundaries.

Bears, along with wolves, are the most sought after wild animals in YNP and TNP by tourists for viewing and admiring. The bears do not know the borders of the Parks, like Montana FWP already allowed precious daily-watched wolves to be killed by Montana hunters. There are habituated bears, like #399, in the TNP who casually walk in and out of TNP, and are loved by tourists. So you would allow the same type of slaughter of "once-in-a-lifetime" views of a species, the grizzly, that aren't available for viewing by the public anywhere else in the US. In addition, we desperately need grizzlies like #399 who is clever, resourceful, adequately protects cubs from males, eat a variety of food, is a great mother, who commonly has triplets, raised to adulthood, so the population does grow.

Bears, who suddenly after 40 years become hunted, will be naïve about the change in laws and the invisible borders. This will be a travesty, and you won't cut off the hunting soon enough; you and the state wildlife agencies do not have the staff to properly manage the hunting and other human kills of the grizzly on a timely basis.

This decision to delist is an obvious political pre-decision. You've got biologists that have not been thorough and maybe their jobs are on the line. I've listened to Dr. David Mattson several times so I know who is thorough, scientific, very experienced in the GYE and straight forward. You haven't considered the types of food that grizzlies teach their cubs to eat, which determines how many cubs will survive their first year; meat-eaters for example are more likely not to live.

You have not considered the grizzly gene pool, their need for wide ranging habitat, connections with other grizzly populations, such as in northwest Montana. You are upsetting the balance of nature by contriving a proposal to remove all protections, and additionally allowing them to be slaughtered by hunters in the three states. You are creating a type of zoo, totally controlled by man, instead of allowing natural forces and habitat expansion and human development to naturally manage grizzly bears. The State of Wyoming is particularly a concern as administrators of the State have been known for years to be anti-wolf and want to shoot every single one. Your agency backed down regarding wolves in that state, and the same appears to be true for the grizzly. I do not trust your agency to make sure the states have an adequate bear plan.

This proposal is outrageous, mostly due to the allowance of hunting by the 3 adjacent states, but also the other points I have made. Grizzly bear populations are severely reduced in the US due to human encroachment (logging, agriculture, development, lack of suitable habitat, anti-wildlife people) over the years since humans expanded throughout the US. How can any of you look me in the face and tell me that we have a wild animal that has recovered enough to make it on his own; and send out the hunters to kill, along with all the other unnecessary grizzly killings by humans? Stop this insanity! I love all wild animals, whether I see them or not, and we have an obligation as humans to treat them in high respect, not some number to manage for, and creating their untimely deaths.



Patricia A. Simmons
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My name is **Tim Border**, and I live in Gallatin Gateway Montana. I am here today to oppose the delisting of the Yellowstone Grizzly. I believe now is not the time to delist. There is much more that needs to be addressed before it becomes open trophy season on these magnificent animals. As a fifth generation Montanan, born in Bozeman, I have explored most of South Central and Southwest Montana over the past 55 years. Over those years, I had the privilege of viewing grizzlies in many different settings. One close enough that required the use of pepper spray. If I didn't see the grizzly, I encountered signs of them in many places. I watched grizzlies feed at the open dumps near West Yellowstone before they were closed. During the years, I have crossed grizzly tracks in the Gavellies, Tobacco Roots and the Crazies. I no longer see signs of the grizzly in these areas. They have been stopped in their efforts to travel a corridor of connectivity to other grizzly populations. One vital connective corridor is the Centennial Range west of the Park. It is one of a very few mountain ranges in Montana that run east to west making it an ideal path for grizzlies and other wildlife to travel to areas further West and over time to Glacier and Central Idaho. These connections will help assure a diversified genetic Yellowstone grizzly population. This interaction is critical to the long-term health of the Yellowstone Grizzly. Currently, they are living on an island devoid of new genetics. The U.S. experimental sheep station that straddles the range must go before delisting the grizzly. Years ago I came across a few sheepherders in the Gravelly's that were in a process of disposing of a grizzly that had killed some of their sheep the previous night. Shoot, shovel and shut up was the code of the West back then and there is nothing to show that this fact has changed. The dead grizzly recently found on the sheep experiment lands reflect this fact. As a hunter of 48 years, I find it obscene to hunt these beautiful animals. Why are they hunted? It certainly is not for the meat. Is it solely for the sport of killing a grizzly with no regard for its soul that makes one feel brave? Many issues have not been researched or researched incorrectly regarding the delisting. Now is not the time to delist. Now is the time to do the proper research.

Thank you for this opportunity to comment☺

Tim Border
P.O. Box 348
Gallatin Gateway, MT
59120

My name is Elissa Chott, and I am speaking as a representative of Great Bear Foundation.

The Rule acknowledges the rapid decline of whitebark pine, but rather than including it as one of four important food sources for GYE grizzlies, as stated in the 2007 rule, this current proposal merely claims it *can* be a significant food source, severely deemphasizing the role whitebark pine has in a grizzly bear's diet. The Services' research found grizzly bears' selection of whitebark pine seeds has declined since 2000, coinciding with whitebark pine population declines reaching epidemic proportions, but the agency fails to acknowledge the likely causal connection of stark and rapid declines of whitebark pine populations being a limiting factor for grizzly bears using it as a food source. The proposal states one-third of grizzly bears do not have whitebark pine in their home range, but does not elaborate to clarify if a lack of whitebark pine is because the species does not grow in those regions or if those populations have been decimated by beetles and blister rust, therefore removing that vital food source from the bear's diet. We do not support delisting of the GYE grizzlies.

GRIZZLY STATEMENT

A personal note: When I was about 15, a friend invited me to go crow hunting. When I asked permission, my father asked; "are you going to eat them?" I said "no". He said; "Then you are not going hunting". What if I had asked if I could go grizzly hunting??

Last Fall I put a 2 point muley and a whitetail doe in the freezer, fulfilling my mythic hunter's role as a provider for my family (while practicing my favorite sport).

I question the moral and biological appropriateness of killing a magnificent grizzly just to have a trophy on the wall. Moral? Some 35 tribes have passed resolutions opposing the delisting of Yellowstone grizzlies, an animal considered a sacred symbol of spiritual renewal.

Biological? It took decades for the population to recover after being declared endangered. While current numbers appear to be stable, a perfect storm of threats already menace the Yellowstone grizzly population. These include:

- Drastic loss of whitebark pine due to bark beetle outbreaks, resulting in a) the loss of a major food source, especially for females with cubs, and b) greater human/livestock contact compared to isolated whitebark pine forests which once sheltered feeding bears.
- Decimation of cutthroat trout as a food source due to predation by lake trout illegally introduced in Yellowstone Lake.
- Incipient loss of high elevation cutworm as a food source due to climate warming-caused habitat change.
- The shift to greater mammalian food dependence by grizzlies, including elk (declining due to hunting and wolf and bear predation), bison (spreading beyond YNP) and livestock (with resultant human conflict).

Why the rush to delist the Grizzly? Delisting of the grizzly appears to be a political, not a scientifically based decision— particularly given state bias favoring hunting.

Joshua C. Dickinson

PhD – Cultural plant geography

Post Doc – Ecology

Career – Natural resource management

Father and son of a hunter

Spell
Hello, my name is Kristen Ellingsen. Thank you for this chance to enter the conversation regarding the proposed delisting of Grizzly Bears. SELF

I'm currently a resident of Gallatin Gateway and I'm also a native of the Greater Yellowstone Ecosystem. I was born in Jackson Hole, Wyoming and then, from the age of six, spent most of my life in Montana. ^{In short} Nonetheless, compared to the native people who came before, and compared to the great bears who arrived tens of thousands of years ago, I'm a newcomer. Regardless of my status, I'm here today to request continued listing, ~~and therefore continued protection~~, for our grizzly bears.

It's great news that we now have, perhaps, something like 700 bears in the Greater Yellowstone Ecosystem, but success often comes with new problems, and the world has changed a lot since 1975. We have criss-crossed the land with roads and fences that spell out, in rigid grids, our collective ignorance about the needs of wildlife to move, ~~to walk, to run, to hop, to swim,~~ in search of water, food, shelter, and breeding. ^{mates} In addition, in my opinion, we have contributed to the sweeping climate changes that are now transforming our planet. ~~I know I cannot possibly imagine the difficulties that the bears, conscious beings in large, sometimes huge bodies, face in finding enough to eat while their traditional food staples—such as white bark pine and native cutthroat trout—^{are} vanish from the landscape.~~

^{white bark pine and} I earned a Bachelor's degree in Zoology, here at MSU, and a Master's in Ecology and Evolutionary Biology at the University of Arizona. I understand that population dynamics and species-level considerations must contribute to the mosaic of decisions at the US Fish and Wildlife. But I also believe that we, the apex predator with binocular vision, ^{information behind} ~~on planet Earth~~, can also choose to be mono-corrected when it comes to management decisions . . . with one eye looking at the big picture, the population increase for the bears, and the other looking close-up, into the eyes of each of the animals that we attempt to "manage." I am speaking here of relationship, for each bear is an individual, the same as me, or you, or any of your children, or your grandchildren. In the wild, each bear we come in contact with forms an instant relationship, in the here and now, with each of us. I have had two such encounters, each with a bear that chose to avoid conflict. I fear that if delisting leads to increased hunting, and it almost certainly will, there will be too many ^{adrenalin-infused moments,} ~~moving parts, too much we don't understand.~~ How will hunters know for sure which bear is being shot . . . a reckless teenager or the brain trust for generations of

^{youngster}

From: Georgia Baker georgiabaker88@gmail.com
Subject:
Date: April 12, 2016 at 3:50 PM
To:



The question at stake is whether grizzly bears should remain a healthy part of Montana's natural and cultural heritage?

If we agree, then we need to strongly advocate for state and federal protections during this continuing time of recovery while helping to create a healthy and connected habitat for the Montana grizzly bear.

My name is Georgia Baker and am a proud North American, having grown up in British Columbia, Canada and having lived in Alaska and presently in Montana where I am working to advocate for the grizzly bear.

The information I wish to share with you has been reported by the David Suzuki Foundation. I grew up with a TV series called "The Nature of Things" with David Suzuki, who has been the recipient of a long list of Canadian and international awards.

In the Suzuki Foundation report entitled "A Grizzly Challenge, *Ensuring a Future for Alberta's Threatened Grizzlies*", it is reported that most biologists believe grizzly bears are an essential part of a healthy, fully functioning ecosystem. They are termed "ecosystem engineers" that help to regulate prey species and disperse the seeds of many plant species. They also help to maintain plant and forest health, both by aerating the soil as they dig for roots, pine nuts and ground squirrels. In regions where salmon spawn, they move thousands of kilograms of carcasses into the forest, where trees and other plants absorb their high levels of nitrogen. This type of species is called a "keystone" species. One estimate indicates that by protecting grizzly bears in the Central Canadian Rockies, approximately 400 terrestrial vertebrate species will also be protected.

The progress made in the Greater Yellowstone Ecosystem has been applauded by the province of Alberta, where the number of bears there are diminishing at an alarming rate. This is also because of human pressure on remaining habitat, forcing the bears into fragmented populations which leads to poorer nutrition, lower reproductive rates, and higher levels of human-bear conflict and human-caused mortalities.

The Suzuki report states that some scientific research suggests that grizzly bear population units should number at least 500-700 individuals to outlast catastrophic natural events, food availability and human behaviour in order to survive for hundreds of years.

Twice as many bears are needed to maintain genetic diversity and population persistence in order to survive for thousands of years.

The International Union for the Conservation of Nature guidelines, which Alberta uses, recommends that wildlife populations should maintain more than 1000 mature breeding adults to prevent unacceptable risk of decline.

The number of bears in the Greater Yellowstone Ecosystem is below that magic 1000 mature breeding adults and therefore, I believe we are only at the crossroads of our conservation efforts within Montana. I believe that connecting the fragmented bear populations in Montana is the next work to be done to secure a safe, unfragmented bear habitat. We need to support such entities as National Wildlife Federation or Vital Ground who are actively helping to link migration routes.

At this juncture of recovery I believe it is important to address the use of hunting as an "accepted tool" to manage grizzly populations. The Suzuki report states that "there is no scientific evidence to support the claims that sport hunting these large omnivores is a necessary part of keeping people safe. There are far more effective management approaches to allow people and grizzly bears to co-exist without killing so-called "problem" bears. Educating people about how to avoid conflicts with bears, how to hunt safe in bear country and how to carry and use bear spray are the most effective means of preventing dangerous bear-human encounters. Pepper spray, for instance, stops undesirable behaviour by bears 92% of the time, and has been proven to be more effective than firearms". The report states that hunting bears to help keep them wild and wary of humans and hunting them to keep the population healthy by eliminating older bears are both myths. Check out the NPS.gov website on bear safety before venturing out.

Like a very popular ad campaign called "Shoot Alaska" to encourage tourism, we need to encourage the same, shooting with our cameras rather than with our firearms!

A well-known Canadian author, the late Andy Russell wrote in his book "Grizzly Country" in 1967, which highlighted the disappearing wilderness 50 years ago, said, "Man...has chosen to fight the wilderness blindly, attempting to break nature to his needs, at war with it and sometimes mercilessly destroying the very things he needs the most. The grizzly can show us something of what it means to live in harmony with nature."

I believe the grizzly bear is essential to the health of the human spirit as well as essential to the ecosystems of their last remaining habitat. Maintaining healthy grizzly populations in this region is equal to clean air and clean water. All "Keystone" species are key to maintaining a healthy planet.

Thank you.

Georgia Baker
Georgia Baker ArtWorks
406-599-5272

4-12 Grizzly Bear Delisting Comment:

As a local citizen living in Belgrade Montana, I support the science based conservation and management of Grizzly Bear populations in the Greater Yellowstone Ecosystem. The unbiased data clearly indicates the population is recovered, and numbers are stable to increasing. In truth, the bear population is likely exceeding the carrying capacity of the region, which often leads to lower cub survival & sow reproductive rates. Grizzly bears have demonstrated food adaptability, actually increasing in population in spite of the white bark pine & cutthroat trout declines within the region.

The goal of the Endangered Species Act is the recovery of a listed species, and not listing status into perpetuity because a species is deemed charismatic by a segment of the public. The state wildlife agencies are staffed with expert biologists that are highly capable of accepting the science based management of this population. Managing Grizzly Bears for sustainability will have minimal impact on overall population numbers, and will boost local support and state funding for sustainable bear management.

Thank you for the opportunity to comment this evening.

Jerry Muething

Belgrade, MT

My name is Sharon Sutherland, and I have lived in the Gallatin Valley for 32 yrs. Thank you for the opportunity to comment on the US Fish and Wildlife Service proposed ruling to remove Endangered Species Act Protection from grizzly bears in the Greater Yellowstone area.

I am opposed to the delisting because I believe it is premature. The recovery of the grizzly bear is a success story, but it is a precarious one, and it would not take much for the population to take a serious reduction, especially if hunting the bear, which I am adamantly opposed to, happens. One of the serious flaws of the plan is that it allows the acceptable mortality rate for bears to be exceeded for 3 yrs. in a row before a review is undertaken, and even then, relisting may not be required.

Grizzly bears are an iconic animal, and present in only 2% of their former range. We are fortunate to have them in Montana, Idaho and Wyoming. They are highly valued by photographers and tourists, as well as residents of these states, the rest of the country and the world. Tourism is the second biggest engine of Montana's economy. I was in Yellowstone Park for 3 days last week, and despite the early season, people were there from all over the country and all over the world. And, they to a person wanted to see a grizzly bear and helped the gateway economies with their presence, spending money in the motels, restaurants, stores and gas stations.

There are too many factors that put the survival of the Great Bear at risk in the event of their delisting. They are slow-breeding, females give birth every 2 yrs. at the most; two of their food sources, whitebark pine and cutthroat trout, are in decline; there is no connectivity between the Greater Yellowstone population and others; the population has been pretty much stagnant for the last 10 yrs. or so, and the number of bears killed by human conflict has risen steadily to 63 in 2015. More needs to be done to prevent conflicts between bears and hunters and ranchers, more methods of coexistence tried rather than lethal control, and that also is not included in the plan.

There is also no allowance in the delisting regulations for the protection of bears that live in Yellowstone and Grand Teton, but wander outside the Parks to forage or den. These are the most-viewed and loved bears in the Ecosystem, that millions have seen, and are used to being around people, so would be sitting ducks for hunters. Bears like #399, who Tom Mangelsen and Todd Wilkinson recently wrote a book about. I can only imagine the bad publicity and uproar if someone was to kill that bear – it would make the fierce reaction to the death of Cecil the lion seem tame.

Additionally, the states of Montana, Wyoming and Idaho do not have a great record when it comes to managing a recently de-listed species, as we have seen with the gray wolf. We need to ensure the future of this magnificent animal and taking away the protection of the Endangered Species Act is not the answer at this time.

Clint Nagel, I would like to read comments on behalf of The Gallatin Wildlife Association. The Gallatin Wildlife Association (GWA) is a non-profit volunteer wildlife conservation organization representing hunters, anglers and other wildlife advocates in Southwest Montana and elsewhere. Our mission is to protect habitat and conserve fish and wildlife. GWA supports sustainable management of fish and wildlife populations through fair chase public hunting and fishing opportunities that will ensure these traditions are passed on for future generations to enjoy. We support the Montana constitution which states: "the opportunity to harvest wild game is a heritage that shall forever be preserved" and that "the legislature shall provide adequate remedies to prevent unreasonable depletion of natural resources." We appreciate this opportunity to provide additional comment to the ill-advised draft plan by the U.S. Fish and Wildlife Service to delist grizzly bears.

We say ill-advised because the work of the listing of the Endangered Species Act is not finished. Yes, it is true that the population of grizzly bears has increased and their distribution has increased since they were first delisted. But there is more to success than just population numbers and distribution. We are concerned about the vitality and viability of this species in the future. We are concerned many want these bears delisted just to begin hunting, that they see them as an economic asset. There is much more than that at stake here.

→ ~~for~~ trophy hunting.
from

To us success is when we see a species ability to survive in numbers and distribution and increase and maintain their genetic viability through natural connectivity without man's manipulation or interference. We don't see grizzly bears occupying only 2% of their natural range and habitat as a success. We do see that if these bears are delisted, you can kiss any chance of connectivity "Good-bye". There are many threats imposed upon grizzlies which prevent them from having connectivity. Accidental deaths from automobiles, livestock grazing

allotments, shootings - justified and those not justified and so on and so on. And it is those bears who are more likely to travel outside the protection of Yellowstone National Park, those bears that are more likely to try to reach connectivity that will be shot.

There is ^{*This is a myth.*} also a fallacy that bears are omnivores so they can eat anything. There are too many assumptions based upon this rationale. Climate change or global warming is changing all that. Yes, they can eat many things, but how nutritious is that diet going to be? Even Army Cutworm moths which the bear has turned to for a large part of their diet will be affected by climate change. Nutrition is a key element in reproduction. The loss of whitebark pine is another key food source which they can no longer rely on. Meat diets are dangerous because it is there that they are more likely to compete with and contact man, which in many cases is a death warrant for the bear.

For these reasons and there are more which time won't allow for this evening, we strongly urge that the delisting proposal be done away with. Let's at least wait for another 5 years or so, so we can tell if the population of the bear is increasing. Because some scientist state that the population numbers have only flatlined at best since ~~2000~~ ^{*2006.*}. What is the hurry?

Finally there is this under the National Forest Management Act of 1976. In Appendix 4-2 Rationale for Viability Compliance. 36 CFR 219.19.

"In order to insure that viable populations will be maintained, habitat must be provided to support, at least, a minimum number of reproductive individuals and that habitat must be well distributed so that those individuals can interact with others in the planning area."

How is this going to be reasoned or managed when pressures will be so great, greater than they are now, that genetic diversity cannot and will not be maintained.

Again, We are against delisting.

Thank you for the opportunity to comment.