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U.S. Fish and Wildlife Service

Or to whom it may concern:

I have been writing on the behalf of grizzly bear protection for what seems like years now. And on March 11, the U.S. Fish and Wildlife Service announced a decision to delist grizzly bears. I am very disappointed in such action. I understand the local political pressure placed upon the agency by those who want to further that cause. There are some groups and organizations who want to hold the listing of grizzly bears up as a success story and the removal of this species from the Endangered Species Act (ESA) serves that purpose. Yet there are still others who want delisting for no other purpose other than selfish reasons.

It is true that grizzly bears are considered an icon to what wilderness was in the American West. They are not alone, however. Not only have they been an icon to the American West, but specifically to the Greater Yellowstone Ecosystem. And it is true that the ESA has played a large role in that recovery of the species in terms of population numbers. But the work is not done. Population numbers alone should not be the only measure of success or failure. In the 21st century, life is more complicated than that. There are pressures placed upon predators and all of the other species of the wild that weren't perhaps even considered 30-50 years ago. If we listen to the

science, we would acknowledge that reality. What was the goal in the beginning? Was it just to increase their population numbers or make sure they can exist after delisting and exist in a healthy state of reference? Pressures such as shifting food sources and climate change are perhaps two new threats that weren't considered years ago, but they are very much part of the reality today. Isolation and the number of conflicts with hunters and livestock has not improved, but has deteriorated. I will admit that there are some in the science community who disagree on the likelihood of the vitality for a healthy population after delisting. But even with the opposing views, that should be enough to push the pause button on the action of delisting. Even that should be enough to say that now is not the time to strip them of endangered species protections. There is too much still unknown.

Even with the protection from the ESA, grizzly bears still occupy less than 2% of their original historic range. How is that considered a success? It is known that the growth rate of the population has been stagnant since the early 2000s. And the reason for that is because more bears are dying as a result of conflicts with hunters and livestock, and fewer cubs are surviving to adulthood. How is that going to improve after delisting? It won't. I thought one of the goals was to make sure that the grizzlies of the Greater Yellowstone Ecosystem (GYE) can grow in number and distribution so that they can reach other populations of the Northern Continental Divide Ecosystem (NCDE). How is that going to happen after delisting? It won't.

Just because the population has reached a certain number within the Yellowstone Ecosystem does not mean they are in sufficient number to

preserve the progress made. It is obvious that states cannot be trusted to manage wildlife. The three states of Montana, Wyoming and Idaho have shown little if any ability to be in agreement when it comes to managing wolves or other species. I see grizzly bear management from these states no different. There would need to be some uniformity, consistency, and communication among these three states to prevent elimination of the bear from certain landscapes. There has been no such history of such behavior of coordinating efforts. There is too much of a "God Complex" among institutional governments. The same could be said perhaps for the U.S. Fish and Wildlife Service. That brings up another issue, how can we in good faith justify delisting a segment of a population of a species. That alone tells me that the species as a whole are not in good standing when it comes to being self-sustaining. If delisting occurs there will be pressures to allow trophy hunting and more pressure to kill nuisance bears. All of this will decrease the population numbers and will curtail any movement of bears of the GYE to those of the NCDE preventing any genetic carry over. It is not improbable then that up to 100 bears could be killed by such action of delisting; meaning any progress made would be short lived. Grizzlies of the GYE will become more isolated basically resigning this iconic bear to the status quo at best, which in and of itself is a death sentence unless bears would be placed back under protection on behalf of the ESA.

It is known through science that bears reproduce very slowly. How many bears die of natural causes? Most are killed by hunting or by traffic all of which in and of itself affect the genetic makeup of bears. Bears are not

allowed even today to reach maturity let alone old age because of adults killing cubs or pressures from hunting or mortality from accidents along highway corridors. Because of the bear's reproduction rate being so low, by the time any review or changes are made in policy, rapid decline of their population would already be in progress.

People and bears can co-exist if we listen to the science and manage our lands appropriately. It is only when selfish need and gain come into play that we think we have the moral upper hand. We do not. Bears are God's creatures too and they have a purpose. We should not undermine the progress made and let bears slide back towards extinction just because of misplaced political hostility or misplaced historical prejudice. As I said at the beginning, these are iconic beings and if truth be known, we have probably more in common with bears than we would think. We can learn from this species. But the appreciation of this species will be greatly compromised if we delist this bear. We will be forcing them to a perhaps meager existence which is not the purpose of the ESA. We need to do better than that.

Thank you for allowing me to comment on the proposed delisting of grizzly bears. I vote a large and resounding "NO" on delisting.

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