The following are comments submitted by members of the Social Media Group called "Don't Delist Grizzlies" in opposition to the USFWS Proposed Rule of taking the Yellowstone Grizzly Bears off the Endangered Species List

Comments Regarding Connectivity

In 1993, the USFWS asserted that all the grizzly populations in the lower 48 states would likely benefit from being inter-connected via areas of suitable habitat. (USFWS, Grizzly Bear Recovery Plan. Missoula Montana, USA 1993). To the date, though, the Greater Yellowstone Grizzly Bears remain geographically and genetically isolated from other grizzly populations.

Isolated populations are more at risk for extinction over the long term, (Soulé, M.E., editor. 1987. Viable populations for conservation. Cambridge University Press, New York), which means lack of connectivity with other populations is a long-term genetic risk for Yellowstone Grizzly Bears. (Haroldson, M.A., C.C. Schwartz, K.C. Kendall, K.A. Gunther, D.S. Moody, K. Frey, and D. Paetkau. 2010. Genetic analysis of individual origins supports isolation of grizzly bears in the Greater Yellowstone Ecosystem. Ursus 21:1-13. BioOne).

It is particularly concerning, in light of this risk, that the Proposed Rule and state management plans FAIL to put forth any specifics for reconnection. To ensure long term viability of the Yellowstone Grizzly Bears, there should be clear plans for establishing and maintaining connectivity with other grizzly populations, reintroducing grizzlies to "suitable vacant range within dispersal distance of existing populations, or facilitating recolonization into former areas." (Peer Reviewer #4, Page 4 of the Peer Review). Unfortunately, both Idaho and Wyoming's plans appear to strongly disfavor reintroduction or facilitating recolonization. (Id. Pages 3,4) Idaho's plan "clearly states that moving grizzlies into new areas (e.g. Bitterroot) is PROHIBITED and intentions to connect Yellowstone Grizzly Bears populations to these unoccupied areas is vague." (Peer Reviewer #4, Page 2 of the Peer Review). Montana's plan to facilitate reconnection is extremely unclear, providing no details other than "to manage for discretionary mortality" and having "attractant storage rules." (Peer Reviewer #4, Page 2 of the Peer Review). Further, Montana does not commit to permitting bear populations to reconnect and expand into recovery areas, like the Selway-Bitteroot Ecosystem.

Not only do states FAIL to provide specifics for reconnection, they assert that connectivity is not even required. "This connectivity is not necessary for long-term sustainability of the Greater Yellowstone Grizzly Bears or NCDE population," the states asserted in their public comments.

Unfortunately, the lands which could link the Yellowstone Grizzly Bear population to other populations lack key protections to allow reconnection. This is evidenced by the high mortality rate of bears outside of the Demographic Monitoring Area. In 2015, the mortality rate outside the DMA was 47%. (IGBST 2015 Annual Report, page 29-30). With death rates at this level, it is unlikely that connectivity will ever happen if the bears are delisted and provisions and protections for an endangered species are removed.

Comments Regarding Public Policy

While we are grateful that USFW has re-opened public comments, we are wondering whether our comments will be counted. During the last comment period, only 2,400 out of 290,000 comments were considered. The rest were thrown out for not being unique and/or substantive. How, though, can a lay person provide substantive comments on a Proposed Rule that is thousands of pages long? The average layperson does not have the time or expertise to peruse documents that are thousands of pages.

The decision to remove the Yellowstone Grizzly Bears from the Endangered Species list; however, is not just a scientific one, it is also a public policy decision. Grizzly Bears are an icon of the American West. The public has a right to weigh in on their future. Should we allow animals such as those to be subject to trophy hunting? Millions of people travel from all over the world to view the Grizzly Bears. What are the economic ramifications of delisting and hunting? How will delisting impact the rest of the Yellowstone Ecosystem? With negative catastrophic result?

Where is the public process allowing lay people to weigh in on the important public policy issue of delisting the Yellowstone Grizzly Bears? Along the same vein, why is verbal testimony only an opportunity afforded to Montana and Wyoming residents? American taxpayers have footed the bill for working on the alleged recovery the Yellowstone Grizzly Bears, not just residents of a couple of states. All Americans should have the opportunity to weigh in and their comments be counted on the potential delisting. Please consider opening additional public hearings across the country.

Comments Regarding Removal of Management Oversight

In their joint comment, dated May 9, 2016 ("Comment"), Wyoming, Montana and Idaho (collectively, "the States") attempt to remove all language from the proposed rule that would hold them accountable for management of the Greater Yellowstone Ecosystem population of grizzly bears. Specifically, they do not want any federal oversight of their management practices after the 5-year monitoring period passes. (Comment, page 4).

Likewise, the States reject the population objective of 674 bears, seeking, instead, a range between 600-747. They have also commented on "managing downward" which suggests they want to allow the population to drop to 600 individuals. (Comment, page 4).

Further, although it is well accepted that the Greater Yellowstone Ecosystem grizzly bears must connect to other populations for long-term survival, the States argue that connectivity is not necessary. (Comment, page 12). As if that were not sufficient, they do not want to allow bears outside of the DMA. Reconnection with other populations, however, cannot occur if bears that leave the DMA are trapped and/or killed by the States.

The States also seek to eliminate the following language:

"The objective for grizzly bear habitat management is to reduce or mitigate the risk of

human-caused mortality" even though approximately 80% of grizzly bear deaths result from conflict with humans. (Comment, page 3; *Planet Jackson Hole, The Buzz: Bear Minimum*, September 14, 2016).

The foregoing comments from the States are extremely concerning. They assert that these conditions have no importance in maintaining a healthy grizzly population whereas USFWS has included these requirements for a reason. If USFWS will allow the States to exclude the foregoing language, it must explain why these requirements are no longer important for survival of the Yellowstone Grizzly Bear population. The States are known to be extremely unfriendly toward predators and repeatedly put the interests of the livestock and fossil fuel industry ahead of the interests of wildlife. How can the public trust that the States will fairly manage Yellowstone Ecosystem Grizzly Bears when they are rejecting federal oversight and accepted scientific tenets?

<u>The following are comments submitted by members of the Social Media Group called "Don't Delist Grizzlies" in opposition to the USFWS Proposed Rule of taking the Yellowstone Grizzly Bears off the Endangered Species List</u>

1. USFWS employs a "simple-minded" and unsubstantiated conception of carrying capacity as a basis for in turn making claims regarding the number of bears able to be sustained in the PCA and DMA and past and future effects of food quality and quantity on Yellowstone Grizzly Bear populations. Carrying capacity changes from year to year and also exhibits long term trends as a function of long term changes because of availability of critical resources, namely food. There have been major declines in virtually all of the ecosystem's elk herds and major declines in the Central Yellowstone Park bison herd. A major decade long decline is also attributable to the drought that lasted from 1998-2008. This decline defies reason and all available evidence to credibly argue otherwise, which is what the USFWS tries to do in the Rule.

2. The monitoring efforts by the IGBST of the availability of grizzly bear use of moth sites, cutthroat trout streams and spring carrion on ungulate winter ranges along with the numbers of cones on whitebark pine is inadequate. They are inadequate because they fail to include foods that are important to detecting early signs of change in Yellowstone's grizzly bear habitat. The IGBST needs to add numbers of elk and bison as well as aerial extent of whitebark pine to its forms of indicators. The IGBST shows that meat from ungulates is becoming increasingly important to Yellowstone's grizzly bears (Schwartz et al 2014, Eginger et al. 2016) and that aerial extent of whitebark pine forests is a critical dimension of grizzly bear habitat (Bjornlie et al 2014, Van Manen et al, 2015).

3. USFWS fails to account for the impacts of recent widespread losses of whitebark pine because it relies on science that is fatally flawed. The Yellowstone Grizzly Bears DO NOT eat the trees themselves, they eat the seeds contained in whitebark pine CONES. (e.g., Mattson & Reinhart 1997). So the availability of whitebark pine seeds needs to be in terms of cone or seed production, NOT the number of cone producing trees, or even the aerial extent of forests containing whitebark trees. IGBST combines the number of mature trees with actual seed production in its recent analysis; thereby, lumping the two together giving a false representation. (e.g., Van Manen et al 2015).

4. Meat sources have contributed between 25% and 60% of the energy and nutrients obtained by Yellowstone Grizzly Bears (Mattson 1997, Jacoby et al 1999, Fortin et al 2013, Schwartz et al 2014). During the 1970's-early 1990's, elk were the source of the majority (53%) of this meat (Matteson 1997). Meat is an important substitute for loss of cutthroat trout and whitebark pine seeds (Fortin et al 2013, Middleton et al 2013). Past, present and future trends in elk population should be considered in the current and future Yellowstone Grizzly Bear population. Negative trends constitute a threat. USFWS FAILS to address the past, present and future

prospect of Yellowstone elk population in any meaningful way. Elk in Yellowstone Grizzly Bear habitat show a trend in decline, but one herd (the Upper Madison) showing a near tripling mortality rates among elk calves due to increased bear predation (Middleton et al 2013).

5. Past and future trends in elk population should be considered in the current and future Yellowstone Grizzly Bear population. Negative trends constitute a threat. USFWS FAILS to address the past, present and future prospects of Yellowstone elk population in any meaningful way. Elk in Yellowstone Grizzly Bear habitat show a trend in DECLINE, but 1 herd (The Upper Madison) showing a near tripling mortality rates among elk calves due to increased bear predation (Middleton 2013)

6. USFWS FAILS to meaningfully account for changes in bison populations and foreseeable threats to this food source. Bears obtain nearly ¼ of all ungulate meat from bison (Mattson 1997). Bison have very likely become more rather than less important to the Yellowstone Grizzly Bears (Schwartz et al 2014, Ebinger et al 2016). USFWS FAILS to assess past, present and future trends for bison as part of its risk assessment for Yellowstone Grizzly Bear population, other than a superficial statement in reference to management of brucellosis in bison and goes on to DISMISS bison as an important grizzly bear food.

7. USFWS disregards and misrepresents the best available scientific information in its assessment of the impact of wolves on Yellowstone Grizzly Bears, and essentially disregards wolves altogether as a factor to be considered in their own right. During the spring female grizzly bears ate more meat as opposed to male bears that ate more meat during the summer and fall (Mattson 1997, 2000). Since the reintroduction of wolves, amounts of spring carrion have declined, as a result of declining elk populations. Decline of elk population has been driven by a combination of unsustainable sport harvest, adverse weather, grizzly bear predation on calves, and wolf predation on elk of all sex and age classes (Vucetich et al 2005, Evans et al 2006, Eberhardt et al 2007, Barber-Meyer et al 2008, Griffin et al 2011, Brodie et al 2013, Proffitt el al 2014). Wolf predation has very likely played a part in declines in spring carrion, especially because of selection by wolves for the older and weaker elk that would have otherwise died overwinter and been available to female grizzlies as carrion (Evans et al 2006, Wright et al 2006). USFWS IGNORES this probable indirect role of wolf predation on female grizzly bears. Wolves have been known to kill grizzly bear cubs (see page 13205 of the Rule), a phenomenon that is difficult to detect. This predation by wolves on grizzly bear cubs should not be overlooked.

8. USFWS FAILS throughout the Rule to account for the effect of climate change on past, present and future changes in habit and demography of Yellowstone Grizzly Bears. USFWS NEGLECTS most of the relevant best available science. Climate has warmed and will continue to warm in the Yellowstone Ecosystem. Temperatures have already increased since the late 1940's and will continue to increase at a rapid rate (Chang & Hansen 2014). Drought is of concern and snowpack has declined

since 1980, due to warmer winter and spring conditions (Clow 2010, Pederson et al 2013). The resulting warmer weather has been detrimental to cold-water fish such as cutthroat trout (Williams et al 2009; Isaak et al 2010, 2012, 2015 and Wenger et al 2011). An increase in fire frequency is projected in the Yellowstone ecosystem (Westerling et al 2011, Luo et al 2013, Stavros et al 2014 and Barbero et al 2015). There are climate driven changes in vegetation (e.g., Romme & Turner 1991, Bartlien et al 1997). The Rule neglects high relevance to climate change and what detrimental effects that might bring, and has already brought for the Yellowstone Grizzly Bears.

9. USFWS's assertion that "there is no data to indicate habitat fragmentation within this population is occurring" is WRONG because it contradicts the best available science. There is more than enough evidence of habitat fragmentation within the Yellowstone Ecosystem of Grizzly Bears. Studies performed of fragmentation by Merrill et al 1999, Carroll et al 2001, Merrill & Mattson 2003; Johnson et al 2004, US Forest Service 2006 and Schwartz et al 2010, ALL show a consensus of a high degree of fragmentation and substantial areas of impaired or otherwise deficient habitat. Within the PCA are areas concentrated in the west of the Targhee and Gallatin National Forests, in the far south on the Bridger-Teton National Forest and the in the northeast on the Shoshone and Gallatin National Forests where there are substantial zones of fragmented habitat separating the PCA from a sizable chunk of suitable habitat in the Wind River Range. A large fraction o conflicts between livestock and grizzly bears are currently concentrated in this fracture. USFWS is DEFICIENT in its representation of this body of scientific results.

10. USFWS FAILS to use the best available science in summarizing factors driving levels of human-caused grizzly bear mortality. USFWS FAILS to recognize that human-caused mortality is driven by the distinction between how often bears encounter people and the likelihood that the encounter will end up lethal for the involved bear. Number of bear deaths can be HIGH under conditions of LOW contact, for example encounters between grizzly bears and big game hunters or grizzly bears and wildlife managers operating on behalf of livestock producers, and the number of bear deaths can be LOW under conditions of HIGH contact, for example encounters between habituated bears and masses of tourists along national park roads. It is HUMANS causing the deaths of bears, not the frequency of the encounter that differentiates these kinds of scenarios (Mattson et al 1996a and 1996b). USFWS DOES NOT RECOGNIZE that human-caused bear deaths can vary widely in time and space as a function of human attitudes and behaviors. It contributes every bit as much as the frequency of human-bear contact to total grizzly bear mortality.

11. Grizzly bears can encounter highly lethal people in so-called secure areas at varying rates depending on factors that motivate the bears. The main example of this is grizzly bears encountering elk hunters in the backcountry and the elk hunters leaving behind the elk's organs (Haroldson et al 2004). All of this plays out in the so called "secure" areas where bear mortalities resulting from conflicts with elk

hunters have SKYROCKETED since 2007, mostly located in what the USFWS is calling “secure” habitat.

12. Grizzly bears are free agents motivated by a search for preferred food (e.g. Mattson et al 1992, Haroldson et al 2004) as well as avoidance of other bears (Mattson et al 1987, McLellan and Shackleton 1988). Their movements and redistributions with respect to humans can change over time (Costello et al 2014) with varying degrees resulting in changes in exposure of even the same numbers of bears to different hazards and levels of risk associated with humans and levels of human-caused mortality even with the same amount of so called “secure” habitat. USFWS essentially IGNORES all of this in its “claims” that maintain a baseline dating back to 1998 will somehow insure the security of grizzly bears (e.g., pages 13182 and 13184).

LITERATURE CITED

Barber-Meyer, S.M., Mech, L.D., & White, P.J. (2008). Elk calf survival and mortality following wolf restoration to Yellowstone National Park. Wildlife Monographs, 169(1), 1-30.

Barbero, R., Abatzoglou, J.T., Larkin, N.K. Kolden, C.A., & Stocks, B. (2015). Climate change presents increased potential for very large fires in the contiguous United States. International Journal of Wildland Fire, 24(7), 892-899.

Bartlein, P.J., Whitlock, C., & Shafer, S.L. (1997). Future climate in the Yellowstone National Park region and its potential impact on vegetation. Conservation Biology, 11(3), 782-792.

Bjornlie, D.D., Van Manen, F.T., Ebinger, M.R., Haroldson, M.A., Thompson, D.J., & Costello, C.M. (2014). Whitebark pine, population density, and home-range size of grizzly bears in the Greater Yellowstone Ecosystem. PloS one, 9(2), e88160.

Brodie, J., Johnson, H., Mitchell, M., Zager, P., Proffitt, K., Hebblewhite, M.,…& Gude, J. (2013). Relative influence of human harvest, carnivores, and weather on adult female elk survival across western North America. Journal of Applied Ecology, 50(2), 295-305.

Carroll, C., Noss, R.F., & Paquet, P.C. (2001). Carnivores as focal species for conservation planning in the Rocky Mountain region. Ecological applications, 11(4), 961-980.

Chang, T., Hansen, A.J., & Piekielek, N. (2014). Patterns and variability of projected bioclimatic habitat for Pinus albicaulis in the Greater Yellowstone Area. Plos one, 9(11), e111669

Clow, D.W. (2010). Changes in the timing of snowmelt and streamflow in Colorado: a response to recent warming. Journal of Climate, 23(9), 2293-2306.

Costello, C.M., Manen, F.T., Haroldson, M.A., Ebinger, M.R., Cain, S.L., Gunther, K.A., & Bjornlie, D.D. (2014). Influence of whitebark pine decline on fall habitat use and movements of grizzly bears in the Greater Yellowstone Ecosystem. Ecology and evolution, 4(10), 2004-2018.

Eberhardt, L.L, White, P.J., Garrott, R.A., & Houston, D.B. (2007). A Seventy-Year History of Trends in Yellowstone's Northern Elk Herd. The Journal of Wildlife Management, 71(2), 594-602.

Ebinger, M.R., Haroldson, M.A., Van Manen, F.T., Costello, C.M., Bjornlie, D.D., Thompson, D.J.,…& White, P.J. (2016). Detecting grizzly bear use of ungulate carcasses using global positioning system telemetry and activity data. Oecologia, Online access, 1-14.

Evans, S.B., Mech, L.D., White, P.J., & Sargeant, G.A. (2006). Survival of adult female elk in Yellowstone following wolf restoration. Journal of Wildlife Management, 70(5), 1372-1378.

Fortin, J.K., Schwartz, C.C., Gunter, K.A., Teisberg, J.E., Haroldson, M.A., Evans, M.A., & Robbins, C.T. (2013). Dietary adjustability of grizzly bears and American black bears in Yellowstone National Park. The Journal of Wildlife Management, 77(2), 270-281.

Griffin, K.A., Hebblewhite. M., Robinson, H.S., Zager, P., Barber-meyer, S.M., Christianson, D.,….& Johnson, B.K. (2011). Neonatal mortality of elk driven by climate, predator phenology and predator community composition. Journal of Animal Ecology, 80(6), 1246-1257.

Haroldson, M.A., Schwartz, C.C., Cherry, S., & Moody, D.S. 92004). Possible effects of elk harvest on fall distribution of grizzly bears in the Greater Yellowstone Ecosystem. Journal of Wildlife Management, 68(1), 129-137.

Isaak, D.J., Luce, C.H., Rieman, B.E., Nagel, D.E., Peterson, E.E., Horan, D.L.,…& Chandler, G.L. (2010). Effects of climate change and wildlife on stream temperatures and salmonid thermal habitat in a mountain river network. Ecological Applications, 20(5), 1350-1371.

Isaak, D.J., Muhlfeld, C.C., Todd, A.S., Al-Chokhachy, R., Roberts, J., Kershner, J.L.,…& Hostetler, S.W. (2012). The past as prelude to the future for understanding 21st century climate effects on Rocky Mountain trout. Fisheries, 37(12), 542-556.

Isaak, D.J., Young, M.K., Nagel, D.E., Horan, D.L., & Groce, M.C. (2015). The cold water climate shield: delineating refugia for preserving salmonid fishes through the 21st century. Global change biology, 21(7), 2540-2553.

Jacoby, M.E., Hilderbrand, G.V., Servheen, C., Schwartz, C.C., Arthur, S.M., Hanley, T.A.,…& Michener, R. (1999). Trophic relations of brown and black bears in several western North American ecosystems. The Journal of Wildlife Management, 921-929.

Johnson, C.J., Boyce, M.S., Schwartz, C.C., & Haroldson, M.A. (2004). Modeling survival; application of the Andersen-Gill model to Yellowstone grizzly bears. Journal of Wildlife Management, 68(4), 966-978.

Luo, L., Tang, Y., Zhong, S., Bian, X., & Heilman, W.E. (2013). Will future climate favor more erratic wildfires in the western United States? Journal of Applied Meteorology and Climatology, 52(11), 2410-2417.

Mattson, D.J., Knight, R.R., & Blanchard, B.M. (1987). The effects of developments and primary roads on grizzly bear habitat use in Yellowstone National Park, Wyoming. International Conference on Bear Research & Management, 7, 259-273.

Mattson, D.J., Blanchard, B.M., & Knight, R.R. (1992). Yellowstone grizzly bear mortality, human habituation, and whitebark pine seed crops. The Journal of Wildlife Management, 432-442.

Mattson, D.J., Herrero, S., Wright, R.G., & Pease, C.M. (1996a). Science and management of Rocky Mountain grizzly bears. Conservation Biology, 10(4), 1013-1025.

Mattson, D.J., Herrero, S., Wright, R.G., & Pease, C.M. (1996b). Designing and managing protected areas for grizzly bears: how much is enough. National parks and protected areas: their role in environmental protection. Cambridge, MA: Blackwell Science, 133-164.

Mattson, D.J. (1997). Use of ungulates by Yellowstone grizzly bears Ursus arctos. Biological Conservation, 81(1), 161-177.

Mattson, D.J., & Reinhart, D.P. (1997). Excavation of red squirrel middens by grizzly bears in the whitebark pine zone. Journal of Applied Ecology, 926-940.

Mattson, D.J. (2000). Causes and consequences of dietary differences among Yellowstone grizzly bears (Ursus arctos). Dissertation, University of Idaho, Moscow.

Mclellan, B.N., & Shackleton, D.M. (1988). Grizzly bears and resource-extraction industries: effects of roads on behavior, habitat use and demography. Journal of Applied Ecology, 25, 451-460.

Merrill, T., Mattson, D.J., Wright, R.G., & Quigley, H.B. (1999). Defining landscapes suitable for restoration of grizzly bears Ursus arctos in Idaho. Biological Conservation, 87(2), 231-248.

Merrill, T., & Mattson, D. (2003). The extent and location of habitat biophysically suitable for grizzly bears in the Yellowstone region. Ursus, 14, 171-187.

Middleton, A.D., Morrison, T.A., Fortin, J.K., Robbins, C.T., Proffitt, K.M., White, P.J.,...& Kauffman, J.J. (2013). Grizzly bear predation links the loss of native trout to the demography of migratory elk in Yellowstone. Proceedings of the Royal Society of London B: Biological Sciences, 280(1762), 20130870.

Middleton, A.D., Kauffman, M.J., McWhirter, D.E., Cook, J.G., Cook, R.C. Nelson, A.A.,…& Klaver, R.W. (2013). Animal migration amid shifting patterns of phenology and predation: lessons from a Yellowstone elk herd. Ecology, 94(6), 1245-1256.

Pederson, G.T., Graumlich, L.J., Fagre, D.B., Kipfer, T., & Muhlfeld, C.C. (2010). A century of climate and ecosystem change in Western Montana: what do temperature trends portend? Climatic change, 98(102), 133-154.

Profitt, K.M., Cunningham, J.A., Hamlin, K.L., & Garrott, R.A. (2014). Bottom-up and top-down influences on pregnancy rates and recruitment of northern Yellowstone elk. The Journal of Wildlife Management, 78(8), 1383-1393.

Romme, W.H., & M.G. Turner (1991). Implications of global climate change for biogeographic patterns in the Greater Yellowstone Ecosystem. Conservation Biology, 5(3), 373-386.

Schwartz, C.C., Haroldson, M.A., & White, G.C. (2010). Hazards affecting grizzly bear survival in the Greater Yellowstone Ecosystem. The Journal of Wildlife Management, 74(4), 654-667.

Schwartz, C.C., Fortin, J.K., Teisberg, J.E., Haroldson, M.A., Servheen, C., Robbins, C.T., & Van Manen, F.T. (2014). Body and diet composition of sympatric black and grizzly bears in the Greater Yellowstone Ecosystem. The Journal of Wildlife Management, 78(1), 68-78.

Stavros, E.N., Abatzoglou, J.T., McKenzie, D., & Larkin, N.K. (2014). Regional projections of the likelihood of very large wildland fires under a changing climate in the contiguous Western United States. Climatic Change, 126(3-4), 455-468.

US Forest Service (2006). Forest plan amendment for grizzly bear habitat conservation for the Greater Yellowstone area National Forest: Final Environmental Impact Statement. US Department of Agriculture, Forest Service.

Van Manen, F.T., Haroldson, M.A., Bjornlie, D.D., Ebinger, M.R., Thompson, D.J., Costello, C.M., & White, G.C. (2015). Density dependence, whitebark pine, and vital rates of grizzly bears. The Journal of Wildlife Management, 80, 300-313.

Vucetich, J.A., Smith, D.W., & Stahler, D.R. (2005). Influence of harvest, climate and wolf predation on Yellowstone elk, 1961-2004. Oikos, 111(2), 259-270.

Wenger, S.J., Isaak, D.J., Luce, C.H., Neville, H.M., Fausch, K.D., Dunham, J.B.,…& Hamlet, A.F. (2011). Flow regime, temperature, and biotic interactions drive differential declines of trout species under climate change. Proceedings of the National Academy of Sciences, 108(34), 14175-14180.

Westerling, A.L., M.G. Turner, E.A. Smithwick, W.H. Romme, & M.G. Ryan. 2011. Continued warming could transform greater Yellowstone fire regimes by mid-21st century. Proceedings of the National Academy of Sciences, 108932), 13165-13170.

Williams, J.E., Haak, A.L., Neville, H.M., & Colyer, W.T. (2009). Potential consequences of climate change to persistence of cutthroat trout populations. North American Journal of Fisheries Management, 29(3), 533-548.

Wright, G.J., Peterson, R.O., Smith, D.W., & Lemke, T.O. (2006). Selection of northern Yellowstone elk by gray wolves and hunters. Journal of Wildlife Management, 70(4), 1070-1078.

Don't Delist Grizzlies
P.O. Box 431
New York, New York 10038-9991

September 23, 2016

US Fish and Wildlife Service
MS: BPHC, 5275
Leesburg Pike, Falls Church, VA 22041-3803

RE: Proposed Delisting of the Yellowstone Grizzly Bears from the Endangered Species Act

Dear US Fish and Wildlife Service,

Attached are comments submitted on behalf of the social media group entitled Don't Delist Grizzlies, in opposition of the proposed delisting of the Yellowstone Grizzly Bears from the Endangered Species Act along with supporting cites.

Thank you in advance for your cooperation concerning this matter.

Very truly yours,

Don't Delist Grizzlies

/Enclosures