

Director Daniel M Ashe
U.S. Fish and Wildlife, MS: BPHC
5275 Leesburg Pike, Falls Church, VA 22041-3803
Attn: Docket No. FWS–R6–ES–2016–0042

My name is Robert Brigham. I am a Bozemanite and I am an ethical hunter who was fortunate to grow up just north of Yellowstone National Park.

I have some thoughts on the proposed delisting plan to withdraw Endangered Species Act (ESA) protections for the North American brown bears, or grizzly bears (*Ursus arctos horribilis*) in the Greater Yellowstone Ecosystem (GYE) and the additional proposal to identify Yellowstone grizzlies as a Distinct Population Segment (DPS). Removing grizzlies from the Federal Lists of Endangered and Threatened Wildlife is a consequential decision and should be based on the best science and the public interest, not political favors for special interests. I have some general thoughts, specific concerns, and five policy prescriptions. I am unfortunately unable to list all of my concerns due to the insufficient period for public comment.

Here's my assessment of the proposal to delist grizzly bears: it's sure looks like the wolverine disaster all over again. Or the last grizzly delisting disaster. It looks like a pattern. There is the public appearance that the U.S. Fish and Wildlife Service (USFWS) is again ignoring science and reality and Climate Change to cave to political pressure from special interests. The optics are simply awful for USFWS. At a time of growing distrust of institutions, the department would look comically corrupt by – once again – denying Climate Change impacts.

The fact is the grizzly bears in the Greater Yellowstone Ecosystem are a stranded subpopulation. Despite Endangered Species Act protections, there is still not the necessary connectivity between habitats to reunite the subpopulations in the Northern Rockies Ecosystem. This isn't "one of America's great conservation successes" but proof that ESA protections alone have proven inadequate for decades when it comes to the land use and public infrastructure decisions necessary to reunite isolated habitats. More is needed, not less.

What really chaps my hide is the defeatist mentality underlying delisting. The Greater Yellowstone Ecosystem grizzly bears can't survive as a tiny Distinct Population Segment genetically cut off from the other subpopulation of griz in the Lower 48. Adequate connectivity between subpopulations is a linchpin prerequisite for actual recovery, because even if trucked in bears succeed in reproduction, there isn't enough acreage in the GYE to support the minimum number of bears needed. There needs to be connectivity, not just for genetic diversity, but for adequate population numbers. So when the U.S. Fish and Wildlife Service suggests that Greater Yellowstone Ecosystem grizzlies should lose protections because they are a "distinct population segment," it sounds like USFWS is giving up on the legislative mandate for actual recovery, to instead settle for a government designed, permanent island habitat that lacks the landmass for a sustainable population size. Accepting extirpation between subpopulations is a cynical surrender of grizzly bear recovery efforts. Giving up while claiming a "successful recovery" is fascinating for the combination of hubris and disconnect from reality. Print up a

giant, "MISSION ACCOMPLISHED" banner? In the contiguous US there are two fragile islands of grizzly habitat -- that have yet to be reconnected -- and USFWS wants to call it quits and say, "good enough for government work" while claiming a major success in restoring 1% of the population to 1% of its natural range?

This is bad. Does USFWS have any idea of the public backlash delisting risks? TV producers love Yellowstone as a backdrop. Love it! But national TV pales in comparison to the social media audience. When your delisting results in some assclown killing the world-famous Grizzly 399, the social media storm could easily be a magnitude larger than Cecil the Lion backlash. With national TV loving those Old Faithful and Yellowstone Falls backdrops, there will be a feedback loop between traditional and social media that wasn't possible in Zimbabwe.

And I know the US Fish and Wildlife Service knows about Cecil the Lion because you used the Endangered Species Act as a policy response following the backlash. Why not get ahead of the triggering event this time? Instead of using the Endangered Species Act to provide protections five months after it's too late, continue using the Endangered Species Act as intended to protect our grizzly bears until they have honestly recovered.

The reputation and trustworthiness of the U.S. Fish and Wildlife Service is in jeopardy if this premature delisting of the grizzly continues. This is a big deal. It looks like USFWS is committed to following through on a major policy blunder despite the continued warnings from basically everyone.

I apologize for not being able to list all of my concerns, the arbitrary deadline for public comments was insufficient in duration. Here are some concerns:

- * Will grizzly cubs born in the Greater Yellowstone Ecosystem this spring stop hibernating within their lifetimes? If yes, what percentages. If no, offer evidence. I think this question needs to be answered before removing ESA protections. Not taking a crap for five or more months is kind of a big deal. Having twice as much time to roam is also kind of a big deal. Will cubs in their first spring hibernate their whole lives? Will science based upon bears spending almost half their time in dens be applicable if grizzlies in the American Rockies experience hibernation disruption? What confidence do you have in your answer to this simple question? Wouldn't it make more sense to study this year's cubs their whole lives instead of guessing? The answer to that question is obviously yes. Regardless, the question of hibernation continuing is fundamental. If USFWS continues to fast track delisting, when this ends up in federal court the judge should poll all witnesses and amicus brief filers for a YES or NO answer to the question of whether this season's cubs will hibernate their whole lives.

- * Are the relevant state agencies up to the task? When deciding whether to delist, analysis can't just assume the states will do a good job. All analysis must be based instead on the most likely scenarios involving the actual state agencies involved. The current state agencies seem unable and/or unwilling to successfully manage key species. Idaho Fish & Game asked your colleagues at the Forest Service for permission to use helicopters in the the Frank Church-River

of No Return Wilderness so they could collar elk -- then collared wolves. Just today, Montana Fish, Wildlife and Parks announced plans to triple the wolf harvest adjacent to Yellowstone National Park. While the bison slaughter was stopped by the previous Montana governor, it resumed under the current administration in a bold statement about Montana's interest in protecting iconic species in the Greater Yellowstone Ecosystem. And Wyoming -- I'm not making this up -- in Wyoming they feed the elk. Seriously, daily feedings from the Wyoming Game and Fish Department create these elk feedlots as if their goal was disease transmission in the Greater Yellowstone Ecosystem. It seems illogical to conclude that these states are up to the task of adequate regulatory mechanisms. And delisting requires all three to get it right. What if Montana and Idaho somehow got it right, but Wyoming kept up with the elk feedgrounds while Climate Change and drought combined to disrupt grizzly hibernation?

* Has the rulemaking process been adequate for a decision of this magnitude? USFWS appreciated the value of public participation enough to hold two public informational meetings and public hearings, one in Cody, Wyoming and one in Bozeman, Montana (where I testified). In the 2010 census, Cody's Park County had 28,205 people and Bozeman's Gallatin County had 89,513 Americans. So less than one-half of one-tenth of one-percent of Americans had a public hearing about their grizzly bears in their county. This is not adequate. Grizzly bears aren't just symbolic national treasures, they are actual national treasure. The project of using the Endangered Species Act to protect grizzly bears is a project of all Americans and for all Americans, not just the locals in Bozeman and Cody. But I was at the public hearing in Bozeman and KBZK's Morgan McKay was correct to report that, "almost everyone present stood up to oppose delisting of grizzlies." Shouldn't there at least be public informational meetings and public hearings in the 20 most populous metropolitan areas as defined by the Census Bureau? Why not in the top 50 most populous metropolitan areas?

* Why isn't the federal government prepared to make this decision? This is why regular Americans just don't understand Washington, DC. Over at the Department of Interior, the USFWS wants to delist grizzlies, while over at the Department of Agriculture, the U.S. Forest Service has failed to update habitat management plans for a post-listing reality in the six national forests that comprise the GYE. And speaking of putting the cart before the horse, why aren't state wildlife management plans in place prior to delisting? Some of the finalization of details requires legislative action and we don't let our legislatures meet too often (it's how we stay wild enough for big bears). Why is delisting moving forward prior to the completion of the prerequisite planning? The states have yet to finalize their trophy hunting proposals and the federal government has failed to finalize proposals for habitat protection absent ESA protection. None of the paperwork has been filed, this proposal should be laughed out of the room.

* How will trophy hunting of grizzly bears outside Yellowstone National Park effect the public perception of hunting? Remington Research Group recently conducted public opinion research on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates. They surveyed 3,087 participants from April 7, 2016 to April 9, 2016 and 68% opposed, "opening up trophy hunts on Yellowstone area grizzly bears." That number rose to 80% when non-Fair Chase methods like hounding and baiting were tested. Are ethical hunters going to look bad

because of "guilt by association" with trophy hunters preying upon and iconic and beloved national symbol just outside the planet's first national park? Is that why the Obama Administration is pushing this so hard, because they want the spotlight on trophy hunters so all hunters look bad?

* What about non-hunting predation by humans? Personally, I am alarmed by the current level of grizzlies killed by humans even with ESA protections. Delisting removes all incentives for the states to reign in the current, unacceptably high numbers. Human decisions continue to prevent the grizzly bear dispersion that will lead to reuniting of the stranded habitats. Doesn't it make sense to demand the states respect ESA protections instead of removing the protections?

* What is this nonsense about the Interagency Grizzly Bear Study Team having secret evidence? If it ain't peer reviewed, it ain't science. It is not credible for a government agency to suggest that environmental safeguards should be discontinued because of secret evidence. That's just absurd. The best available public data does not indicate that grizzly bears have recovered and the fact the GYE subspecies remain cut off from their cousins reminds how much more work remains to actually recovering Northern Rockies Ecosystem grizzlies . Secret evidence is not an acceptable justification for claiming that GYE griz are recovered and no longer meet the definition of Endangered or even Threatened. If it's true, prove it. But secret evidence isn't proof, it is only a trigger for BS Detectors.

* How is Climate Change changing diets and behavior? When grizzly bears climb to alpine regions to eat Army Cutworm Moths, what are the behavioral outcomes other than making it a lot easier for researchers to count them? How will Climate Change affect the yearly reliability of Army Cutworm Moths? The staggering loss of both Cutthroat Trout and the seeds of Whitebark Pine cones has been without consequence? Two key food sources practically destroyed, yet everything is fine? Grizzlies will eat anything, so delist despite a food supply in complete turmoil? Just pretend Climate Change won't get worse and assume the worst days are behind griz?

* Why the rush? With none of the necessary management plans finalized, why are these proposals still moving forward? There's only wishful thinking where there needs to be concrete plans for post-delisting management of bears and their habitat. Yet these proposals are still being rushed, with an inadequate period for public comment and public hearings for less than one-half of one-tenth of one-percent of Americans?

* What's driving this decision, politics or science? Everything about this looks suspicious. So the plan is to rush the removal of environmental protections -- that just happen to coincide with extractive industry wishes -- based on secret evidence and despite the fact none of the relevant management planning has been completed? Special interests get their way, while concerned citizens just have to trust that when the details are finalized, three states will have adequate safeguards and just have to trust that a separate federal department will also unveil adequate habitat management plans in six different national forests? This looks like a special interest

giveaway, it lacks any of the traits of effective policy in the interests of the public or the grizzly bear. Is this yet another case of USFWS disregarding Climate Change and ignoring science?

Additional concerns were unable to be presented by the public comment deadline. Just know I have many, many more concerns.

POLICY PRESCRIPTIONS:

1. Immediately extend the public comment period on this proposal by an additional 180 days. While the public has been outraged, this proposal is so bad that not all of its policy disadvantages have had time to be aired. Personally, I can attest that I have been unable to list all of my concerns with delisting prior to the arbitrary deadline. I am currently an American with disabilities that have prevented me listing all of the legal, scientific and public policy ramifications that would result from a decision to remove ESA protections. I believe it would be a reasonable accommodation to allow me an additional 180 days to revise and extend my remarks. In the interests of fairness, everyone else should be given the same opportunity to have their voice heard.

2. Publicly suspend the proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Announce that the U.S. Fish and Wildlife Service was scientifically inaccurate in pretending GYE grizzly bears are a "Distinct Population Segment" instead of a threatened subspecies isolated geographically by human-caused extirpation. I'd even go so far as to suggest USFWS apologize to the American people for the deceit and promise it won't happen again. It is time for a new era at USFWS where Climate Change is respected as a wildcard of a threat to vulnerable, candidate, threatened, and endangered species.

3. Adopt a precautionary framework for policy interpretation of scientific research concerning Climate Change. There is an unfortunate pattern of the U.S. Fish and Wildlife Service getting scolded by federal judges for denying Climate Change impacts. The department needs a new approach. The only way to successfully navigate the uncertainty that accompanies the ever shifting climate models is to appreciate that worst case scenarios have become likely scenarios and are not just coming, but already occurring. The public policy best practices are for USFWS to utilize the Precautionary Principle when interpreting scientific research on predicted Climate Change impacts for individual species under the Endangered Species Act. When considering delisting, Climate Change risk management needs to formally modernize. Absent scientific consensus, the burden of proof to withdraw Endangered Species Act protections needs to fall upon those claiming it will not be harmful. Especially when it comes to the Endangered Species Act, any error needs to be a conservative error. There is simply no excuse for political rulemaking that takes a step backwards for species recovery.

4. Commence a "cooling off period" to allow the rigorous scientific study that should precede a political decision to abandon necessary Endangered Species Act protections. USFWS has it

backwards, instead of a short period for public comment, there should be a long period of scientific study. It's good that grizzly bear research has increased significantly since the last attempt at delisting was quashed by a federal judge. Yet there simply hasn't been enough research for long enough of a time on which to base a rational decision to delist. USFWS should institute a "cooling off period" to allow necessary scientific research that at a minimum exceeds the longevity of grizzlies. While the average lifespan varies by gender, the expectations exceed two decades. Therefore the announced length of the "cooling off period" should be 30-40 years. Postpone delisting and create the necessary "cooling off period" with long-term scientific research that exceeds the full lifespan of the bears studied.

5. Create a new Grizzly Bear Recovery Plan for the Northern Rockies Ecosystem. This is long overdue. Arbitrary state lines that were drawn by east coasters back in the 19th century are absurd divisions when managing of threatened species and their habitats. America needs to protect threatened species of our wildlife at the ecosystem level, that's the job of the U.S. Fish and Wildlife Service under the Endangered Species Act. Washington, DC needs to recognize that grizzly bears can not be considered recovered until the human divided subpopulations have been reunited. Coupled with a three to four decade "cooling off period" to allow the prerequisite scientific study, this will allow the states pushing to delist the time necessary to reunite the subpopulations as proof they can successfully manage the species. Inter-habitat linkage corridors that result in adequate reuniting of the fragile subpopulations must happen before grizzly bears can be honestly considered for delisting. Send a clear message to the states that want to delist that reuniting the subpopulations of grizzly bears in the northern rockies is a prerequisite to delisting, but that they'll have a few decades make it happen. And there's a lot that needs to happen. Recovering grizzly bears in the northern rockies is going to require the construction of wildlife bridges over key highways, including multiple interstates. There needs to be an ecosystem wide approach, lead by USFWS, to secure the patchwork of state land, federal land, conservation easements, public land acquisitions, and partnerships necessary to reunite the subpopulations. This needs to happen before delisting should even be considered.

In conclusion, the USFWS is premature in declaring grizzly bears recovered absent species connectivity that bridges the geographic gap in the Northern Rockies Ecosystem grizzly bear population. Additionally, the secondary proposal that pretends that Greater Yellowstone Ecosystem grizzlies are a "Distinct Population Segment" must be withdrawn permanently. Please respect the science and reject the special interests. Your duty under the Endangered Species Act is to postpone delisting until such a time as the species is actually recovered. Please do not ignore Climate Change again. America is depending upon USFWS to protect our national treasure and continue to utilize ESA protections until the split grizzly populations have reunited and the grizzlies are actually no longer threatened or endangered.

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In conclusion, the USFWS is premature in declaring grizzly bears recovered absent species connectivity that bridges the geographic gap in the Northern Rockies Ecosystem grizzly bear population. Additionally, the secondary proposal that pretends that Greater Yellowstone Ecosystem grizzlies are a "Distinct Population Segment" must be withdrawn permanently. Please respect the science and reject the special interests. Your duty under the Endangered Species Act is to postpone delisting until such a time as the species is actually recovered. Please do not ignore Climate Change again. America is depending upon USFWS to protect our national treasure and continue to utilize ESA protections until the split grizzly populations have reunited and the grizzlies are actually no longer threatened or endangered.

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Attn: Docket No. FWS-R6-ES-2016-0042

My name is Robert Brigham. I am a Bozemanite and I am an ethical hunter who was fortunate to grow up just north of Yellowstone National Park.

I have some thoughts on the proposed delisting plan to withdraw Endangered Species Act (ESA) protections for the North American brown bears, or grizzly bears (*Ursus arctos horribilis*) in the Greater Yellowstone Ecosystem (GYE) and the additional proposal to identify Yellowstone grizzlies as a Distinct Population Segment (DPS). Removing grizzlies from the Federal Lists of Endangered and Threatened Wildlife is a consequential decision and should be based on the best science and the public interest, not political favors for special interests. I have some general thoughts, specific concerns, and five policy prescriptions. I am unfortunately unable to list all of my concerns due to the insufficient period for public comment.

Here's my assessment of the proposal to delist grizzly bears: it's sure looks like the wolverine disaster all over again. Or the last grizzly delisting disaster. It looks like a pattern. There is the public appearance that the U.S. Fish and Wildlife Service (USFWS) is again ignoring science and reality and Climate Change to cave to political pressure from special interests. The optics are simply awful for USFWS. At a time of growing distrust of institutions, the department would look comically corrupt by – once again – denying Climate Change impacts.

The fact is the grizzly bears in the Greater Yellowstone Ecosystem are a stranded subpopulation. Despite Endangered Species Act protections, there is still not the necessary connectivity between habitats to reunite the subpopulations in the Northern Rockies Ecosystem. This isn't "one of America's great conservation successes" but proof that ESA protections alone have proven inadequate for decades when it comes to the land use and public infrastructure decisions necessary to reunite isolated habitats. More is needed, not less.

What really chaps my hide is the defeatist mentality underlying delisting. The Greater Yellowstone Ecosystem grizzly bears can't survive as a tiny Distinct Population Segment genetically cut off from the other subpopulation of griz in the Lower 48. Adequate connectivity between subpopulations is a linchpin prerequisite for actual recovery, because even if trucked in bears succeed in reproduction, there isn't enough acreage in the GYE to support the minimum number of bears needed. There needs to be connectivity, not just for genetic diversity, but for adequate population numbers. So when the U.S. Fish and Wildlife Service suggests that Greater Yellowstone Ecosystem grizzlies should lose protections because they are a "distinct population segment," it sounds like USFWS is giving up on the legislative mandate for actual recovery, to instead settle for a government designed, permanent island habitat that lacks the landmass for a sustainable population size. Accepting extirpation between subpopulations is a cynical surrender of grizzly bear recovery efforts. Giving up while claiming a "successful

recovery" is fascinating for the combination of hubris and disconnect from reality. Print up a giant, "MISSION ACCOMPLISHED" banner? In the contiguous US there are two fragile islands of grizzly habitat -- that have yet to be reconnected -- and USFWS wants to call it quits and say, "good enough for government work" while claiming a major success in restoring 1% of the population to 1% of its natural range?

This is bad. Does USFWS have any idea of the public backlash delisting risks? TV producers love Yellowstone as a backdrop. Love it! But national TV pales in comparison to the social media audience. When your delisting results in some asshole killing the world-famous Grizzly 399, the social media storm could easily be a magnitude larger than Cecil the Lion backlash. With national TV loving those Old Faithful and Yellowstone Falls backdrops, there will be a feedback loop between traditional and social media that wasn't possible in Zimbabwe.

And I know the US Fish and Wildlife Service knows about Cecil the Lion because you used the Endangered Species Act as a policy response following the backlash. Why not get ahead of the triggering event this time? Instead of using the Endangered Species Act to provide protections five months after it's too late, continue using the Endangered Species Act as intended to protect our grizzly bears until they have honestly recovered.

The reputation and trustworthiness of the U.S. Fish and Wildlife Service is in jeopardy if this premature delisting of the grizzly continues. This is a big deal. It looks like USFWS is committed to following through on a major policy blunder despite the continued warnings from basically everyone.

I apologize for not being able to list all of my concerns, the arbitrary deadline for public comments was insufficient in duration. Here are some concerns:

* Will grizzly cubs born in the Greater Yellowstone Ecosystem this spring stop hibernating within their lifetimes? If yes, what percentages. If no, offer evidence. I think this question needs to be answered before removing ESA protections. Not taking a crap for five or more months is kind of a big deal. Having twice as much time to roam is also kind of a big deal. Will cubs in their first spring hibernate their whole lives? Will science based upon bears spending almost half their time in dens be applicable if grizzlies in the American Rockies experience hibernation disruption? What confidence do you have in your answer to this simple question? Wouldn't it make more sense to study this year's cubs their whole lives instead of guessing? The answer to that question is obviously yes. Regardless, the question of hibernation continuing is fundamental. If USFWS continues to fast track delisting, when this ends up in federal court the judge should poll all witnesses and amicus brief filers for a YES or NO answer to the question of whether this season's cubs will hibernate their whole lives.

* Are the relevant state agencies up to the task? When deciding whether to delist, analysis can't just assume the states will do a good job. All analysis must be based instead on the most likely scenarios involving the actual state agencies involved. The current state agencies seem unable

and/or unwilling to successfully manage key species. Idaho Fish & Game asked your colleagues at the Forest Service for permission to use helicopters in the the Frank Church-River of No Return Wilderness so they could collar elk -- then collared wolves. Just today, Montana Fish, Wildlife and Parks announced plans to triple the wolf harvest adjacent to Yellowstone National Park. While the bison slaughter was stopped by the previous Montana governor, it resumed under the current administration in a bold statement about Montana's interest in protecting iconic species in the Greater Yellowstone Ecosystem. And Wyoming -- I'm not making this up -- in Wyoming they feed the elk. Seriously, daily feedings from the Wyoming Game and Fish Department create these elk feedlots as if their goal was disease transmission in the Greater Yellowstone Ecosystem. It seems illogical to conclude that these states are up to the task of adequate regulatory mechanisms. And delisting requires all three to get it right. What if Montana and Idaho somehow got it right, but Wyoming kept up with the elk feedgrounds while Climate Change and drought combined to disrupt grizzly hibernation?

* Has the rulemaking process been adequate for a decision of this magnitude? USFWS appreciated the value of public participation enough to hold two public informational meetings and public hearings, one in Cody, Wyoming and one in Bozeman, Montana (where I testified). In the 2010 census, Cody's Park County had 28,205 people and Bozeman's Gallatin County had 89,513 Americans. So less than one-half of one-tenth of one-percent of Americans had a public hearing about their grizzly bears in their county. This is not adequate. Grizzly bears aren't just symbolic national treasures, they are actual national treasure. The project of using the Endangered Species Act to protect grizzly bears is a project of all Americans and for all Americans, not just the locals in Bozeman and Cody. But I was at the public hearing in Bozeman and KBZK's Morgan McKay was correct to report that, "almost everyone present stood up to oppose delisting of grizzlies." Shouldn't there at least be public informational meetings and public hearings in the 20 most populous metropolitan areas as defined by the Census Bureau? Why not in the top 50 most populous metropolitan areas?

* Why isn't the federal government prepared to make this decision? This is why regular Americans just don't understand Washington, DC. Over at the Department of Interior, the USFWS wants to delist grizzlies, while over at the Department of Agriculture, the U.S. Forest Service has failed to update habitat management plans for a post-listing reality in the six national forests that comprise the GYE. And speaking of putting the cart before the horse, why aren't state wildlife management plans in place prior to delisting? Some of the finalization of details requires legislative action and we don't let our legislatures meet too often (it's how we stay wild enough for big bears). Why is delisting moving forward prior to the completion of the prerequisite planning? The states have yet to finalize their trophy hunting proposals and the federal government has failed to finalize proposals for habitat protection absent ESA protection. None of the paperwork has been filed, this proposal should be laughed out of the room.

* How will trophy hunting of grizzly bears outside Yellowstone National Park effect the public perception of hunting? Remington Research Group recently conducted public opinion research on behalf of the Humane Society of the United States and Wyoming Wildlife Advocates. They

surveyed 3,087 participants from April 7, 2016 to April 9, 2016 and 68% opposed, "opening up trophy hunts on Yellowstone area grizzly bears." That number rose to 80% when non-Fair Chase methods like hounding and baiting were tested. Are ethical hunters going to look bad because of "guilt by association" with trophy hunters preying upon and iconic and beloved national symbol just outside the planet's first national park? Is that why the Obama Administration is pushing this so hard, because they want the spotlight on trophy hunters so all hunters look bad?

* What about non-hunting predation by humans? Personally, I am alarmed by the current level of grizzlies killed by humans even with ESA protections. Delisting removes all incentives for the states to reign in the current, unacceptably high numbers. Human decisions continue to prevent the grizzly bear dispersion that will lead to reuniting of the stranded habitats. Doesn't it make sense to demand the states respect ESA protections instead of removing the protections?

* What is this nonsense about the Interagency Grizzly Bear Study Team having secret evidence? If it ain't peer reviewed, it ain't science. It is not credible for a government agency to suggest that environmental safeguards should be discontinued because of secret evidence. That's just absurd. The best available public data does not indicate that grizzly bears have recovered and the fact the GYE subspecies remain cut off from their cousins reminds how much more work remains to actually recovering Northern Rockies Ecosystem grizzlies. Secret evidence is not an acceptable justification for claiming that GYE griz are recovered and no longer meet the definition of Endangered or even Threatened. If it's true, prove it. But secret evidence isn't proof, it is only a trigger for BS Detectors.

* How is Climate Change changing diets and behavior? When grizzly bears climb to alpine regions to eat Army Cutworm Moths, what are the behavioral outcomes other than making it a lot easier for researchers to count them? How will Climate Change affect the yearly reliability of Army Cutworm Moths? The staggering loss of both Cutthroat Trout and the seeds of Whitebark Pine cones has been without consequence? Two key food sources practically destroyed, yet everything is fine? Grizzlies will eat anything, so delist despite a food supply in complete turmoil? Just pretend Climate Change won't get worse and assume the worst days are behind griz?

* Why the rush? With none of the necessary management plans finalized, why are these proposals still moving forward? There's only wishful thinking where there needs to be concrete plans for post-delisting management of bears and their habitat. Yet these proposals are still being rushed, with an inadequate period for public comment and public hearings for less than one-half of one-tenth of one-percent of Americans?

* What's driving this decision, politics or science? Everything about this looks suspicious. So the plan is to rush the removal of environmental protections -- that just happen to coincide with extractive industry wishes -- based on secret evidence and despite the fact none of the relevant management planning has been completed? Special interests get their way, while concerned

citizens just have to trust that when the details are finalized, three states will have adequate safeguards and just have to trust that a separate federal department will also unveil adequate habitat management plans in six different national forests? This looks like a special interest giveaway, it lacks any of the traits of effective policy in the interests of the public or the grizzly bear. Is this yet another case of USFWS disregarding Climate Change and ignoring science?

Additional concerns were unable to be presented by the public comment deadline. Just know I have many, many more concerns.

POLICY PRESCRIPTIONS:

1. Immediately extend the public comment period on this proposal by an additional 180 days. While the public has been outraged, this proposal is so bad that not all of its policy disadvantages have had time to be aired. Personally, I can attest that I have been unable to list all of my concerns with delisting prior to the arbitrary deadline. I am currently an American with disabilities that have prevented me listing all of the legal, scientific and public policy ramifications that would result from a decision to remove ESA protections. I believe it would be a reasonable accommodation to allow me an additional 180 days to revise and extend my remarks. In the interests of fairness, everyone else should be given the same opportunity to have their voice heard.

2. Publicly suspend the proposal to delist grizzly bears in the Greater Yellowstone Ecosystem. Announce that the U.S. Fish and Wildlife Service was scientifically inaccurate in pretending GYE grizzly bears are a "Distinct Population Segment" instead of a threatened subspecies isolated geographically by human-caused extirpation. I'd even go so far as to suggest USFWS apologize to the American people for the deceit and promise it won't happen again. It is time for a new era at USFWS where Climate Change is respected as a wildcard of a threat to vulnerable, candidate, threatened, and endangered species.

3. Adopt a precautionary framework for policy interpretation of scientific research concerning Climate Change. There is an unfortunate pattern of the U.S. Fish and Wildlife Service getting scolded by federal judges for denying Climate Change impacts. The department needs a new approach. The only way to successfully navigate the uncertainty that accompanies the ever shifting climate models is to appreciate that worst case scenarios have become likely scenarios and are not just coming, but already occurring. The public policy best practices are for USFWS to utilize the Precautionary Principle when interpreting scientific research on predicted Climate Change impacts for individual species under the Endangered Species Act. When considering delisting, Climate Change risk management needs to formally modernize. Absent scientific consensus, the burden of proof to withdraw Endangered Species Act protections needs to fall upon those claiming it will not be harmful. Especially when it comes to the Endangered Species

Act, any error needs to be a conservative error. There is simply no excuse for political rulemaking that takes a step backwards for species recovery.

4. Commence a "cooling off period" to allow the rigorous scientific study that should precede a political decision to abandon necessary Endangered Species Act protections. USFWS has it backwards, instead of a short period for public comment, there should be a long period of scientific study. It's good that grizzly bear research has increased significantly since the last attempt at delisting was quashed by a federal judge. Yet there simply hasn't been enough research for long enough of a time on which to base a rational decision to delist. USFWS should institute a "cooling off period" to allow necessary scientific research that at a minimum exceeds the longevity of grizzlies. While the average lifespan varies by gender, the expectations exceed two decades. Therefore the announced length of the "cooling off period" should be 30-40 years. Postpone delisting and create the necessary "cooling off period" with long-term scientific research that exceeds the full lifespan of the bears studied.

5. Create a new Grizzly Bear Recovery Plan for the Northern Rockies Ecosystem. This is long overdue. Arbitrary state lines that were drawn by east coasters back in the 19th century are absurd divisions when managing of threatened species and their habitats. America needs to protect threatened species of our wildlife at the ecosystem level, that's the job of the U.S. Fish and Wildlife Service under the Endangered Species Act. Washington, DC needs to recognize that grizzly bears can not be considered recovered until the human divided subpopulations have been reunited. Coupled with a three to four decade "cooling off period" to allow the prerequisite scientific study, this will allow the states pushing to delist the time necessary to reunite the subpopulations as proof they can successfully manage the species. Inter-habitat linkage corridors that result in adequate reuniting of the fragile subpopulations must happen before grizzly bears can be honestly considered for delisting. Send a clear message to the states that want to delist that reuniting the subpopulations of grizzly bears in the northern rockies is a prerequisite to delisting, but that they'll have a few decades make it happen. And there's a lot that needs to happen. Recovering grizzly bears in the northern rockies is going to require the construction of wildlife bridges over key highways, including multiple interstates. There needs to be an ecosystem wide approach, lead by USFWS, to secure the patchwork of state land, federal land, conservation easements, public land acquisitions, and partnerships necessary to reunite the subpopulations. This needs to happen before delisting should even be considered.

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